VII.

RESPONSE TO COMMENTS

CITY OF CALEXICO

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Planning Department
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May 10, 2005

To: **LAFCo**, attn: Jurg Heuberger, 509 South 8th Street, El Centro, CA
City of Calexico, attn: Marlene Best, City Manager , 608 Heber Avenue, Calexico.
City of Calexico, attn Tony Wong, City Engineer, 608 Heber Avenue, Calexico.
California Department of Transportation, attn Mario Orso, Caltrans District 11, Mail Station #50, 2829 Juan Street, San Diego
Imperial County Public Works, attn: Tim Jones, Director of Public Works, 155 South 11th Street, El Centro.
California Department of Fish and Game, Eastern Sierra/Inland Deserts Region, 78078 Country Club Dr., Ste. 109, Bermuda Dunes,
Air Pollution Control District, attn: Brad Poiriez, Senior Manager, 150 South Ninth Street, El Centro.

Subject: **UA2003-17, Venezia Development Project.**
Notice of Mitigated Negative Declaration & Public Hearing

Dear Agency Member,
Thank you for providing the City of Calexico with comments on the above referenced project. City staff has reviewed agency comments and has provided a "response to comments", attached hereto. The City of Calexico Planning Commission will consider approval of Final Mitigated Negative Declaration at a scheduled public hearing on May 23, 2005. The Mitigated Negative Declaration document and project application are available for public review at the office of Planning Department, 608 Heber Avenue, Calexico, Ca.

If you have any questions or need additional information, please do not hesitate to contact the undersigned.
Sincerely,

Ricardo Hinojosa
Planning Director
(760) 768-2118

Attach: Response to comments dated April 21, 2005
Response to comments dated March 16, 2005

Cc: Project file

DEVELOPMENT DESIGN & ENGINEERING, INC.

PLANNING • CIVIL ENGINEERING • LAND SURVEYING • PROJECT MANAGEMENT

April 22, 2005

To: City of Calexico
Attn: Ricardo Hinojosa, Planning Director
608 Heber Ave
Calexico, CA 92231

Subject: **Response to Comments (2nd response)**
Venezia Tentative Tract Map, Case No. UA2003-73

Dear Ricardo,

Since the March 16th letter Response to Comments new comments have been generated. These comments for the Venezia Tentative Tract Map (TTM) have been reviewed and are consolidated with responses below (▪). Comments were submitted from the following agencies:

1. City of Calexico Engineering Department
2. California Department of Fish and Game (CDFG)
3. Department of Transportation, District 11 (CALTRANS)

In addition, the consultant traffic engineer; Linscott, Law, and Greenspan, has provided responses to the Imperial County Public Works Department comments from a March 1, 2005 letter.

I. City of Calexico Engineering Department

The following are responses in a letter that was received from the Imperial County Public Works Department dated March 30, 2005. Note, the first comment is from the original comment dated 1/21/05.

A. Street Circulation Element Issues and Impact

1. *1/21/05:* Highway 98 connection should be made at vicinity of Jade Ave. of the Tierrasanta Subdivision. The future road connection from this proposal should be compatible with the already approved Jade Ave. connection by Caltrans. The proposed east-west street identified in the map as Calle Vernier will need to provide 84' R/W width. This street alignment is at issue that there has not been any progress made with the owner of Tierrasanta Subdivision and Caltrans. The Owner/Developer shall be required to contact, mitigate, and secure an approved alignment and connection with Hwy 98 from Caltrans and the owner of the Tierrasanta Subdivision development.

3/30/05: This item has not been satisfactorily mitigated. A concurrence and approval letter from the affected property owner and Caltrans on the intersection relocation will be required prior to the final MND certification for the CEQA clearance. The proposed east-west street identified in the map as Calle Vernier will need to provide 84' R/W width and thru the Commercial Development to this intersection at Hwy 98.

- **Response: Although an intersection will be required to satisfy the city's circulation requirements, the adjacent property owner, and Caltrans, the location is still under review and the project shall be conditioned accordingly. The proposed commercial intersection along Highway 98 will not occur unless an agreement has been achieved by these 3 agencies. See attached letters. Currently, the revised map will only propose a "right-in/right-out" within the central northern boundary of the proposed commercial site along Highway 98 and the developer agrees that any access along Highway 98 shall be approved by Caltrans and the City of Calexico.**

2. *1/21/05:* Bowker Road needs to be extended to include the bridge widen at Highway 98 to include the All American Canal. The bridge and highway combine alignment is approximately 350 feet in length by 100 feet in width on Bowker Road. Additionally, Hwy 98 widening to four lanes may be required on both side. Fair share cost will be determined as part of the Eastside Calexico Facilities II Study undertaken by the CM Ranch development.

   3/30/05: Traffic Analysis has determined that Bowker Road north of LaVigne Road will be six-lanes; therefore, a 126; R/W dedication is required. Base on the traffic analysis and the review comments and recommendation of Imperial County Public Works and the development's access point, Bowker Road is the only existing ingress and egress access point: therefore, the connection near Jade Ave. and Hwy 98 is an important mitigation measure that must be secure prior to the approval of CEQA clearance. Additionally, the mitigation measurer the Bowker Road and Hwy 98 intersection improvement will need to be constructed prior to the issuance of occupancy permit. Bowker Road and Hwy 98 intersection will have to be designed and improved as part of the mitigation measures and conditions of approval of the tentative map.
   (Emphasize: Bowker Road R/W and traffic flow distribution at South of Hwy 98 is still being re-evaluated regarding to the 100'R/W vs. the 126'R/W).

   - **Response: If required, the developer will redesign the map to accommodate this ROW, however, at the time of this writing staff was not able to confirm this requirement (see final note above in parentheses). The MMP has identified the appropriate timing of the intersection improvements.**

3. *1/21/05:* Layout of street pattern should be in compliance with the City's General Plan Circulation Element (i.e. Jade Ave. connection as identified in Item 1 above).

   3/30/05: See I-1 above (refers to original comment found in item 1 of this letter)

   - **Response: See item 1 response above.**

4. *1/21/05:* Identify other collector streets with the adjacent development layouts such as the City's master plan concept that is currently under development. Calle De Camaro south bound will have to be connected thru to Second Street at the South.

   3/30/05: The MND responses identified the wrong location. See returned tentative map mark up.

   - **Response: The revised TTM submitted to the City of Calexico on 4/14/05 denotes the change.**

5. *1/21/05:* Provide street connection of 75 feet R/W north-south street connection at approximately 1,000 feet west of the eastside tract boundary. The City is currently making the design coordination between these two developments to comply with the City's Street Circulation Element.

   3/30/05: The Public Works/Engineering Department will need a revised Tentative Map with the changes identified herein.

   - **Response: The TTM with this minor amendment was submitted to the City of Calexico on 4/14/05**

B. Sewer Element Issues and Impact

1. *1/21/05:* Prepare a sewer master plan that is in accordance with the City's master sewer plan and to ascertain that me trunk gravity line will be able to accompany the flow, or to upgrade the Tierrasanta Unit 1 pump station and its gravity line and the yet to be built force main (FM) to receive the flows from this development. Submit a sewer feasibility study as part of the Tentative Map submittal. All costs shall be responsible by this development.

   3/30/05: The Preliminary Master Sewer Study dated March, 2005 is not adequate. The deficient points are outlined as follows:

   1. It has not considered the available capacity of the existing 21" diameter gravity flow pipe at Hwy 98 and Meadows Road.

2. Provide a demand analysis of the Sewer Services Areas "G" and "I" because this development is within the Sewer Service Area "H" in the City's Sewer Master Plan.
3. The Submersible pumps are not acceptable City Standard. The master plan layout need to continue the existing pump location and replace with the higher capacity pumps that conforms to the City standard (Use Gorman Rupp Self Primin Lift Impeller type pumps).
4. Provide a cost estimate for upgrade of the pump station and all off-site lines for both the gravity and force main line.

City's Analysis:
"An Evaluation Report of Wastewater and Treatment Plant Expansion and Sewer Line Upgrade" (Report) by Tetra Tech, Inc. showed the Hydraulic Capacity at Meadows and Hwy 98 is 2,8000 gpm for the 21" diameter line. A more liberal flow capacity can be extended to 3,400 gpm. This sewer line is currently serving Sewer Service Area "G" and "I" that consisted of 498 acres and 1,510 acres respectively. Using its general criteria of 2.2 gpm/acres, this projects to a demand flow of 4,420 gpm in which we still have deficient capacity of 1,020 gpm. Currently some of the Bravo Victoria, Eastside Village, and Las Brisas homes are still under construction, but when these homes are completed at its build out, there is not capacity to accommodate this proposed tract development. This development is part of the Sewer Service Area "H" as identified in the City's Sewer Service Area Master Plan. The final plan will ultimately have to be reverted to drain to the City's Regional Sewer Pump Station at Bowker and LaVigne as it is currently planned.
Additionally, the "Report" identified that there is no excess plant capacity to support future development without obligating a twenty million dollar ($17,900,000 construction plus design engineering, administration, and construction engineering) CIP funding for upgrade of the existing sewer plant.
The Regional Pump Station and the force main will be part of the fair share cost element in the City's Sewer Master Plan.

Provide a complete feasibility study together with cost estimate for the upgrade of the force main line, the 12" diameter gravity line, the pump station and wet well plus the modification of the switch back to drain to the Regional Pump Station requirement.

- **Response: The TTM has been revised to show a connection to the proposed sewer pump station on La Vinge Road consistent with the proposed infrastructure master plan. The TTM was submitted to the City of Calexico on 4/14/05.**

C. Water Element Issues and Impact

1. *1/21/05:* The City is currently proceeding on the construction phase of its Phase III water master plan at the eastside. The 30-inch diameter line running north at Bowker

Road will benefit this development; however, a second water line loop will be required at the eastside street tract boundary.

2. *1/21/05:* Prepare a water master plan that integrates with the City's Phase III and the CM Ranch water master plan.

3. *1/21/05:* Provide a second connection of proper size at the eastside to form a loop connection for the water master plan as stated in Item 1 above.

   3/30/05: Funding obligation for the Phase III water master plan is also needed. The construction cost is estimated at $7,500,000 plus 15% administration and construction engineering.

   - **Response: The applicant shall agree to participate in the construction of this facility pursuant to the proposed infrastructure Master Plan and on a fair share basis.**

D. Community Facility District

1. *1/21/05:* A cost participation for the regional infrastructure program (i.e. the East Calexico Facilities Area II Improvement) will be needed. This program is being addressed by the City's consultant on the CM Ranch development that will included but not limited to: off-site streets, bridges at La Vigne Read and Bowker Road at the All American Canal, sewer distribution line and lift station, water, regional retention basins, and storm drain systems, etc.

2. *1/21/05:* A maintenance and operation of the Regional Retention Basin for drainage will need to be addressed.

   3/30/05: Developer's commitment in the formation of CFD is needed.

   - **Response: As stated on 3/16/05 response, the project will participate in a "fair share" regional infrastructure program. The maintenance and operation plan for the regional retention basin needs to be provided for further review and discussions.**

II. California Department of Fish & Game (CDFG)

The following are responses to a letter from the CDFG dated March 23, 2005.

A. Any burrows that cannot be mitigated should be mitigated at a 2:1 ratio with artificial burrows located in an adjacent protected area that provides a minimum of 6.5 acres per pair or solitary owl.

   - **Response: The developer agrees to this requirement.**

III. Dept. of Transportation, District 11 (Caltrans)

The comments by Caltrans dated March 24, 2005 and the responses by Linscott, Law, and Greenspan Traffic Engineer Consultants in an April 15, 2005 memo are attached.

Please contact me at (760) 353-8110 if you have any questions.

Thank you,

Daniel Arvizo
Associate Planner

Attachments:

1) Copy of March 16, 2005 response to comments letter
2) Comments from the City of Calexico Engineering Department, March 30, 2005
3) Copy of letter from California Fish & Game dated March 23, 2005
4) Copy of letter from Caltrans dated March 24, 2005
5) Memo responding to Caltrans letter and Imperial County Public Works

C:

LAFCo, attn: Jurg Heuberger, 509 South 8th Street, El Centro, CA 92243
City of Calexico, attn: Marlene Best, City Manager and, 608 Heber Avenue, Calexico, CA 92231
City of Calexico, attn Tony Wong, City Engineer, 608 Heber Avenue, Calexico, CA 92231
California Department of Transportation, attn Mario Orso, Caltrans District 11, Mail Station #50, 2829 Juan Street, San Diego, CA 92110
Imperial County Public Works, attn: Tim Jones, Director of Public Works, 155 South 11th Street, El Centro, CA 92243
California Department of Fish and Game, Eastern Sierra/Inland Deserts Region, 78078 Country Club Drl, Ste. 109, Bermuda Dunes, CA 92201

DEVELOPMENT DESIGN & ENGINEERING, INC.

PLANNING • CIVIL ENGINEERING • LAND SURVEYING • PROJECT MANAGEMENT

March 16, 2005

To: City of Calexico
Attn: Ricardo Hinojosa, Planning Director
608 Heber Ave
Calexico, CA 92231

Subject: Notice of Mitigated Negative Declaration Case No. UA2003-73

Dear Ricardo,

The comments for the Venezia Tentative Tract Map (TTM) have been reviewed and are consolidated with responses below. Comments were made from the following agencies:

1. Imperial County Public Works Department
2. Imperial County Air Pollution Control District (APCD)
3. City of Calexico Public Works Department
4. City of Calexico Engineering Department

I. Imperial County Public Works

The following are responses in a letter that was received from the Imperial County Public Works Department dated March 1, 2005.

A. The proposed access through a 45 degree diagonal entrance at the intersection of Bowker Road and State Route 98 is not recommended due to sight distance problems for viewing traffic traveling from the west. It is suggested that the access be oriented as close to 90 degrees from the access road.

Response: The project site is proposed for annexation into the City of Calexico. Realignment of the existing Bowker Road intersection is not possible because of its current alignment with Bowker Road to the north. However the intersection is planned for a signalized control access. To avoid sight distance problems, it is recommended that a "no right on red" sign be placed at the north/northeast bound traffic signal light.

1122 State Street, Suite D, El Centro • California 92243 • Tel: (760) 353-3110 • Fax: (760) 352-6408 • e-mail address: ddeinc@usa.net

B. Sheet No. 3 - Existing road classifications:

1. Meadows Road is classified as a Major Collector in the Imperial County Circulation Element.
2. Bowker Road is classified as a Minor Arterial in the Imperial County Circulation Element. Additionally the posted speed is 55 miles per hour.
3. Jasper Road is classified as a Major Collector in the Imperial County Circulation Element.
4. Cole Road is classified as a Prime Arterial in the Imperial County Circulation Element. Additionally the posted speed is 55 miles per hour.
5. State Route 111 posted speed is 65 miles per hour.

Response: Since the project is planned for annexation into the City of Calexico, the project has been prepared under City of Calexico road classifications and the City's General Plan.

C. Sheet 18 – Year 2025 Analysis

1. Table 9-1 calls for Bowker Road future road classification south of State Route 98 as collector. This portion of Bowker Road should be minimally classified as a Minor Arterial.

Response: Since the project is planned for annexation into the City of Calexico, the project has been prepared under City of Calexico road classifications and the City's General Plan.

D. Appendix B - County of Imperial Road classifications

1. Appendix "B" should be replaced with the latest Imperial County General Plan Circulation and Scenic Highways Element updated December 16, 2003.

Response: Since the project is planned for annexation into the City of Calexico, the project has been prepared under City of Calexico road classifications and the City's General Plan.

II. Imperial County Air Pollution Control District (ICAPCD)

The following are responses to a letter from the ICAPCD dated February 14, 2005.

A. Project Title

1. The cover page has Venezia Planned Community and all information provided in the first paragraph of this letter, and then other documents in the package (such as the Environmental Checklist Form) refer to the project title as Venezia Tentative Tract Map.

Response: This oversight was clarified at a meeting with Brad Poiriez, the Air Pollution Control Senior Manager for Imperial County on February 23, 2005. The project title is Venezia Estates.

B. Description of Project

1. There are differences in amount of acreage (79 on cover page to 76 as mentioned on Venezia Project Profile and in Landmark's Geotechnical Evaluation and GS Lyon Consultants Environmental Site Assessment).

Response: The amount was clarified at a meeting with Brad Poiriez, the Air Pollution Control Senior Manager for Imperial County on February 23, 2005. The project area is 78.31 acres.

Secondly, according to cover page the assessment should be done on 1,598 dwelling units and land for commercial use but according to the Project Profile it is only 242 homes, and further identified in the Environmental Checklist form on page 2 as 248 homes, and the January 10, 2005 traffic study refers to it as 250 homes, and the January 26, 2004 letter from Investigative Science and Engineering, Inc. regarding the acoustical site assessment refers to this project as the Salas residential 'subdivision that consists of a total of 287 dwelling units and 14 acres for commercial development.

Response: The number of units was clarified at a meeting with Brad Poiriez, the Air Pollution Control Senior Manager for Imperial County on February 23, 2005. There are 242 single-family homes.

C. Surrounding Land Uses and Setting

1. According to the Environmental Checklist Form on page 2, number 9 describes surrounding land uses and mentions the CM Ranch planned subdivision which is a 660 acre mixed use project with over 1,900 homes, three school sites, 40 acres of commercial use and 24 acres of multi-family residential. The ICAPCD agrees with Mr. C. Hui Lai, City Traffic Engineer's Jan. 22, 2005 comment letter as it refers to this development under his comment #5. This project must be evaluated in the traffic study as another potential impact and/or cumulative impact.

   Response: A letter dated 1/28/05 from Linscott, Law, & Greenspan, states:

   "The CM Ranch project was not included in the cumulative section of the traffic study based on a directive following a meeting between the City of Calexico and Design, Development Engineering representatives. The data available for the CM Ranch project, upon completion of the Venezia Planned Community Traffic Study, were not sufficient to enable its inclusion in the cumulative projects section of the report."

In addition, a complete project application for CM Ranch had not been submitted within the time line of the Venezia project application. As of March 8, 2005, a traffic study had not been forwarded to Development Design and Engineering, Inc., or Linscott, Law, & Greenspan for review and incorporation.

D. Request for a Comprehensive Air Quality Analysis

1. In summary, the ICAPCD believes an EIR that includes a comprehensive air quality analysis be completed for this project and that all mitigation measures as outlined in Section 7 of the CEQA Air Quality Handbook be implemented.

   Response: At a meeting with Brad Poiriez, the Air Pollution Control Senior Manager for Imperial County on February 23, 2005, it was agreed that the mitigation measures outlined in the CEQA Air Quality Handbook (February 2005) would be incorporated into the project. This would then satisfy the concerns of the APCD.

III. City of Calexico Public Works/Engineering Department

The following responses are in regards to the review and analysis comments by the Public Works/Engineering Department for the Venezia Estates Tentative Tract Map dated January 21, 2005.

A. Street Circulation Element Issues and Impact

1. Highway 98 connection should be made at vicinity of Jade Ave. of the Tierrasanta Subdivision. The future road connection from this proposal should be compatible with the already approved Jade Ave. connection by Caltrans. The proposed east-west street identified in the map as Calle Vernier will need to provide 84' R/W width. This street alignment is at issue that there has not been any progress made with the owner of Tierrasanta Subdivision and Caltrans. The Owner/Developer shall be required to contact, mitigate, and secure an approved alignment and connection with Hwy 98 from Caltrans and the owner of the Tierrasanta Subdivision development.

   Response: The intersection alignment with the Tierrasanta Development is currently being resolved through negotiations with the City of Calexico, Cal-Trans, and the adjacent developer.

2. Bowker Road needs to be extended to include the bridge widen at Highway 98 to include the All American Canal. The bridge and highway combine alignment is approximately 350 feet in length by 100 feet in width on Bowker Road. Additionally, Hwy 98 widening to four lanes may be required on both side. Fair share cost will be determined as part of the Eastside Calexico Facilities II Study undertaken by the CM Ranch development.

   Response: The intersection improvements are shown on the tentative map. Acceleration and deceleration lanes are also proposed. The traffic study has also outlined the necessary improvements for the intersection.

3. Layout of street pattern should be in compliance with the City's General Plan Circulation Element (i.e. Jade Ave. connection as identified in Item 1 above).

   Response: It is the intent of the street designs to be in conformance with the current General Plan and the forthcoming General Plan Update.

4. Identify other collector streets with the adjacent development layouts such as the City's master plan concept that is currently under

development. Calle De Camaro south bound will have to be connected thru to Second Street at the South.

Response: It is the intent of the tentative map to provide connectivity to the future development to the south. Flexibility in the map has been provided with the location of parks and temporary retention basins.

5. Provide street connection of 75 feet R/W north-south street connection at approximately 1,000 feet west of the eastside tract boundary. The City is currently making the design coordination between these two developments to comply with the City's Street Circulation Element.

Response: A half street of 37.5 feet has been provided on the eastern boundary of the project site.

6. Prepare a revised Tentative Map with the final resolution of the street alignment identified above.

Response: This has been done. See response (5) above.

B. Traffic Issues and Impact Analysis

The following are comments made by C. Hui Lai, City Traffic Engineer regarding the revised traffic study comments (dated January 22, 2005) for the Venezia TTM traffic study dated January 10, 2005. The responses provided are from Linscott Law & Greenspan (1/28/05). A revised traffic study will be available after March 24, 2005.

1. **Traffic counts need to be updated and adjustment factors recalculated**

In response to my comment review letter dated October 12, 2004, the revised traffic study has increased the existing traffic volumes that were counted in the summer by 40%. However, a review of the adjusted existing traffic volumes shown in Figure 3-2 of the revised traffic study reveals that not all the traffic data was adjusted by 40%.

The following locations were not adjusted and will need to be increased by 40% to compensate for a lesser amount of traffic due to schools that were not in session and agricultural workers that do not work in the summer.

a. SR 111 & Cole Road

b. SR 111 and S.R. 98
c. Rockwood Road and Cole Road.

Linscott Law & Greenspan Response: The locations on SR 111 were not increased by 40% as these counts were not completed during the summer months. As stated in the report (page 4), they were conducted in May 2003 and increased by 5% to account growth between the year 2003 and 2004.

The Rockwood Road / Cole Road intersection was increased by 40% as were all of the other intersections in the revised report.

2. **Heavy truck traffic routes need to be considered and thoroughly analyzed relative to traffic mitigation requirements**

As stated in my review letter dated October 12, 2004 (Page Three, Number Four), truck traffic must be accounted for at intersections known to have significant heavy truck impacts. The revised traffic study fails to consider or identify impacts at intersections from heavy truck traffic.

The study needs to be revised to analyze the effect of heavy truck traffic routes at intersections in order to develop appropriate mitigation, if impacts are significant.

Linscott Law & Greenspan Response: Heavy vehicle factors were applied to all of the intersections analyzed within the study area in the Highway Capacity Manual (HCM) analysis. The percentages were determined using the CALTRANS truck traffic counts as referenced in the report (page 5).

3. **Year 2025 intersection traffic analysis is needed**

In my review letter dated October 12, 2004, a Year 2025 intersection traffic analysis was requested. The revised study (Section 9.0, Year 2025 Analysis) indicates that because the Imperial County Traffic Model does not have peak hour traffic turning movement volume for intersections, no Year 2025 intersection traffic analysis was performed.

However, this type of analysis is possible using the peak hour turning movement analysis already provided in the study along with 2025 information available in the Imperial County Traffic Model. The 2025 Intersection Traffic Analysis is necessary to properly analyze future traffic impacts from this project. Traffic congestion takes place primarily at intersections. Street segments typically do not

experience traffic congestion except near intersection approaches. This was why I specifically asked for a Year 2025 intersection traffic analysis.

In addition to the City needing this information to analyze future traffic impacts from the project, Caltrans will also require this level of analysis. Caltrans will require an Encroachment Permit for the project in order to install traffic signals at the intersection of S.R. 98 and Bowker Road, as recommended by the study. As part of the Caltrans permit process, traffic signal warrant calculations will be required. For the intersection to be signalized, the traffic signal warrant calculations are based on Year 2025 traffic.

To ensure that the 2025 intersection traffic analysis is completed, I recommend that either the traffic study be revised to include the requested 2025 analysis or that the project applicant deposit a fee with the City. The City would then provide the needed traffic signal design services and prepare all the required traffic signal warrant studies, including the Year 2025 intersection traffic analysis.

Linscott Law & Greenspan Response: The Imperial County Traffic Model (ICTM) did not provide enough proximate information to adequately calculate the year 2025 peak hour volumes. More specifically, 2025 ADT volumes are required at all four legs of each intersection in order to calculate the peak hour volumes. Only four ADT volumes were available in the entire project study area from the ICTM. Any volumes calculated for the year 2025 would be laden with far-reaching assumptions and speculation that could not readily be justified.

We agree that a 2025 signal warrant analysis will be needed at the intersection of Bowker Road and SR 98 in the future. This analysis, however, would not necessarily need to be conducted as part of the report discussed here. In any event, we will be happy to include this analysis in the traffic study.

4. **Jasper Road will need widening and traffic signalization**

Jasper Road provides alternate access to and from the project site. Therefore, the project shall also contribute a fair-share fee towards the widening of Jasper Road from S.R. 111 to Bowker Road and the new traffic signalization of the intersections of Jasper Road/S-R 111 and Jasper Road/Bowker Road.

Linscott Law & Greenspan Response: Jasper Road and the associated intersections were not included in the traffic study given the negligible contribution of traffic to Jasper Road. We

are not adverse, however, to calculating the fair share contribution for the Venezia Planned Community.

5. **Include CM Ranch project for cumulative impact analysis**

Section 6.0, Cumulative Project Traffic, of the revised study identified a total of 13 development projects for cumulative traffic analysis. However, the study did not include the CM Ranch project which is in very close proximity to Venezia project. Although the Environmental Impact Report (EIR) for the CM Ranch project is not completed at this time, the CM Ranch project is a significant development in the vicinity of the Venezia project. Therefore, the CM Ranch project traffic should be identified and analyzed in the cumulative section of the Venezia project traffic study.

An estimate of the traffic generated from the CM Ranch project along with any traffic data and analysis that has been performed for the CM Ranch project to date should be included in the final Venezia traffic study. If traffic data from the CM Ranch project is not readily available, the Venezia project shall contribute a fair-share fee toward additional traffic mitigation as required by the City.

Linscott Law & Greenspan Response: The CM Ranch project was not included in the cumulative section of the traffic study based on a directive following a meeting between the City of Calexico and Design, Development Engineering representatives. The data available for the CM Ranch project, upon completion of the Venezia Planned Community Traffic Study, were not sufficient to enable its inclusion in the cumulative projects section of the report.

In addition, a complete project application for CM Ranch had not been submitted within the time line of the Venezia project application. As of March 8, 2005, a traffic study had not been forwarded to Development Design and Engineering, Inc., or Linscott, Law, & Greenspan for review and incorporation.

6. **Widen S.R. 98 from Meadows Road to east of Bowker Road**

The traffic study recommends a fair-share contribution towards the widening of S.R. 98 to four lanes between Meadows Road and the western project boundary. In order to accommodate a left-turn lane for westbound traffic on S.R. 98 at Bowker Road, I recommend that the widening of S.R. 98 be extended at a minimum of 1,000 feet east of Bowker Road instead of terminating at the western project boundary.

Linscott Law & Greenspan Response: No action necessarily required as this comment is a recommendation rather than a requirement.

7. **Align Project Commercial Access Entrance with Jade Avenue**

The project access entrance on S.R. 98 for the commercial portion of the project should align directly across the future Jade Avenue connection with S.R. 98. Caltrans has agreed with this future connection at S.R. 98 for the Tierrasanta Subdivision.

Linscott Law & Greenspan Response: CALTRANS has agreed with the future connection of SR 98 and the Tierrasanta Subdivision, however, upon completion of the Venezia Planned Community Traffic Study, the connector street was undefined thus the street was referred to as Project Access Point rather than Jade Avenue or Sapphire Road – the two possible connectors.

8. **Synchronize traffic signals along Bowker Road**

Due to the close proximity between the proposed traffic signals at Jasper Road/Bowker Road, Cole Road/Bowker Road, S.R. 98/Bowker Road and Bowker Road/Piazza San Marco, a 2-inch conduit with communication cables shall be installed along Bowker Road between Jasper Road and Piazza San Marco to synchronize these traffic signals.

Linscott Law & Greenspan Response: This comment is a recommendation to synchronize traffic signals and will be included in the Traffic Study.

9. **Recommended mitigation measures**

All the traffic mitigation improvements recommended on Pages 21 through 24 of the traffic study are acceptable.

Linscott Law & Greenspan Response: No action required. The mitigation measures referred to in the report have been accepted.

C. Drainage Element Issues and Impact

The following are comments from the City Engineer, Tony Wong (January 21, 2005).

1. Integrate retention basin design with the City's master plan of retention basin to accompany the Regional Retention Basin Concept. This will be maintained by setup of a community facility district.

2. Prepare a master drainage plan to comply with the City's current design standard and criteria.

Response: The project will provide a temporary retention basin (& park) until integration can occur with a future regional retention basin. During the improvement plan design, a master drainage plan will be prepared.

D. Sewer Element Issues and Impact

1. The off-site trunk sewer line and the Regional Pump Station that the development connects at Bowker Road are not available yet. This development will need to coordinate with the City's master plan of sewer development in order to arrive a proper priority and the schedule of the availability for both developments. The pump station at Tierrasanta Unit 1 is not adequate to accommodate this development. Additionally, its force main to Highway 98 and Meadows Road has not yet been built. The gravity line at Sapphire Street may not have adequate depth for this development without a major reconstruction of the Tierrasanta Subdivision gravity sewer line and the upgrade of the Lift Station including the force main (FM) line.

2. Prepare a sewer master plan that is in accordance with the City's master sewer plan and to ascertain that me trunk gravity line will be able to accompany the flow, or to upgrade the Tierrasanta Unit 1 pump station and its gravity line and the yet to be built force main (FM) to receive the flows from this development. Submit a sewer feasibility study as part of the Tentative Map submittal. All costs shall be responsible by this development.

Response: See attached "Preliminary Master Sewer Study" prepared by Guillermo Sillas, Civil Engineer with Development Design and Engineering, Inc.

E. Water Element Issues and Impact

1. The City is currently proceeding on the construction phase of its Phase III water master plan at the eastside. The 30-inch diameter line running north at Bowker Road will benefit this development; however, a second water line loop will be required at the eastside street tract boundary.

2. Prepare a water master plan that integrates with the City's Phase III and the CM Ranch water master plan.

3. Provide a second connection of proper size at the eastside to form a loop connection for the water master plan as stated in Item 1 above.

Response: The project will provide a second water line loop at the eastside tract boundary (see TTM). A water master plan will address the City's Phase III and the CM Ranch water master plan. A second connection of proper size is planned (see TTM).

F. Community Facility District

1. A cost participation for the regional infrastructure program (i.e. the East Calexico Facilities Area II Improvement) will be needed. This program is being addressed by the City's consultant on the CM Ranch development that will included but not limited to: off-site streets, bridges at La Vigne Read and Bowker Road at the All American Canal, sewer distribution line and lift station, water, regional retention basins, and storm drain systems, etc.

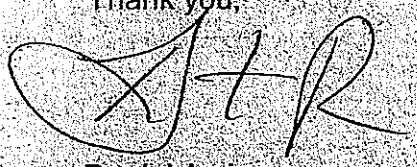
2. A maintenance and operation of the Regional Retention Basin for drainage will need to be addressed.

Response: The project will participate in a "fair share" regional infrastructure program. The maintenance and operation plan for the regional retention basin needs to be provided for further review and discussions.

Based on these comments and responses above, we have revised the Environmental Checklist. Once we have received your approval, we will provide the City with 20 copies of the revised checklist (bounded).

Please contact me at (760) 353-8110 if you have any questions.

Thank you,



Daniel Arvizo
Associate Planner

Attachments:

1) Copy of comments prepared by the APCD 2/14/05
2) Copy of comments from the City of Calexico
3) Copy of response prepared by Linscott Law & Greenspan 1/28/05
4) Copy of comments prepared by the Imperial County Public Works Department
5) Preliminary Master Sewer Study prepared by Guillermo Sillas, DD&E

C:

LAFCo, attn: Jurg Heuberger, 509 South 8th Street, El Centro, CA 92243
City of Calexico, attn: Marlene Best, City Manager and, 608 Heber Avenue, Calexico, CA 92231
City of Calexico, attn: Luis Estrada, Interim City Building Official, 608 Heber Avenue, Calexico, CA 92231
City of Calexico, attn Tony Wong, City Engineer, 608 Heber Avenue, Calexico, CA 92231
Air Pollution Control District, attn Brad Poiriez, Senior Manager, 150 South Ninth Street, El Centro, CA 92243
California Department of Transportation, attn Brent McDonald, Caltrans District 11, Mail Station #50, 2829 Juan Street, San Diego, CA 92110
Imperial County Public Works, attn: Tim Jones, Director of Public Works, 155 South 11th Street, El Centro, CA 92243

150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2850

TELEPHONE: (760) 482-4606
FAX: (760) 353-9904

AIR POLLUTION CONTROL DISTRICT

RECEIVED
FEB 16 2005
BY:

February 14, 2005

Mr. Ricardo Hinojosa, Planning Director
City of Calexico
608 Heber Ave.
Calexico CA. 92231

SUBJECT: Notice of Mitigated Negative Declaration Case No. UA2003-73

Dear Mr. Hinojosa:

This is in response to the above notice that was received by the Imperial County APCD on February 4, 2005, in which the review period for the Venesa Planned Community (according to the cover page) expires on March 8, 2005. Other documentation in the package states this project title as the Venezia Project. According to the cover page, the Venesa Planned Community is proposed to be a mixed-use development of 1,598 dwelling units with 13.21 acres for commercial use. The project consists of 79 acres on the east side of the City of Calexico.

This package, as received from the City of Calexico Planning Department, is somewhat confusing due to several factors. First of all, the project name is not the same on all documents. The cover page has Venesa Planned Community and all information provided in the first paragraph of this letter; and then other documents in the package (such as the Environmental Checklist Form) refer to the project title as Venezia Tentative Tract Map. There is differences in amount of acreage of (79 on cover page to 76 as mentioned on Venezia Project Profile and in LandMark's Geotechnical Evaluation, and GS Lyon Consultants Environmental Site Assessment).

Secondly, according to cover page the assessment should be done on 1,598 dwelling units and land for commercial use but according to the Project Profile it is only 242 homes, and further identified in the Environmental Checklist form on page 2 as 248 homes, and the January 10, 2005 traffic study refers to it as 250 homes, and the January 26, 2004 letter from Investigative Science and Engineering, Inc. regarding the acoustical site assessment refers to this project as the Salas residential subdivision that consists of a total of 287 dwelling units and 14 acres for commercial development.

According to the Environmental Checklist Form on page 2, number 9. describes surrounding land uses and mentions the CM Ranch planned subdivision which is a 660 acre mixed use project with

over 1,900 homes, three school sites, 40 acres of commercial use and 24 acres of multi-family residential. The ICAPCD agrees with Mr. C.Hui Lai, City Traffic Engineer's Jan. 22, 2005 comment letter as it refers to this development under his comment #5. This project must be evaluated in the traffic study as another potential impact and/or cumulative impact.

The City of Calexico has already been designated by the California Air Resources Board as a "Moderate" non-attainment area for CO emissions and Imperial County as a whole has recently been federally designated by EPA as a "Serious" non-attainment area for PM10. Any large projects have the potential for significant impacts to the air quality of Imperial County if not assessed properly and the appropriate mitigation measures instituted.

The Imperial County Air Pollution Control District has prepared a CEQA Air Quality Handbook to provide guidance to regulatory agencies, developers, consultants, etc. when reviewing proposed projects that may have an air quality impact. For large projects, such as this, that would require the preparation of an EIR, a comprehensive air quality analysis is required as part of the EIR document. The CEQA Air Quality Handbook, Section 6, provides a list with the minimum information required by the air district when developing an environmental impact report. Also, please note that on page 11, Section 5 of the Handbook also specifies use of the CARB approved URBEMIS model which incorporates EMFAC emission factors and ITE trip rates. This can easily been downloaded from CARB's website and the associated project factors input for calculations. A copy of the CEQA Air Quality Handbook is enclosed for your use and consideration.

In summary, the ICAPCD believes an EIR that includes a comprehensive air quality analysis be completed for this project and that all mitigation measures as outlined in Section 7 of the CEQA Air Quality Handbook be implemented.

For further information please call me at 482-4606.

Sincerely,

Brad Poiriez
Senior Manager

cc: Jurg Heuberger, LAFCO Executive Officer
Tom Dubose, Development Design and Engineering

enclosure

CEQA

AIR QUALITY HANDBOOK

Guidelines for the Implementation of the

California Environmental Quality Act of 1970, as amended

prepared by

Imperial County Air Pollution Control District
150 South Ninth Street
El Centro, California

February 2005

TRANSMITTAL RECORD

- Planning Commission (each member)
- Imperial County Planning/Building Department
- City of Brawley
- City of Calexico
- City of El Centro
- City of Holtville
- City of Imperial
- City of Westmorland
- City of Calipatria
- The Coalition of Labor, Agriculture & Business (COLAB)

1. Purpose

According to the California Environmental Quality Act (CEQA) guidelines, each public agency is responsible for its own compliance with CEQA. To accomplish this, each public agency is to adopt objectives, criteria and specific procedures consistent with CEQA guidelines. The guidelines are specific as to the procedures that should be implemented by public agencies.

The intent of this document is to develop CEQA protocol for the Imperial County Air Pollution Control District (ICAPCD)[1]. This protocol has been created to assist lead agencies, planning consultants, air district staff, and project proponents in assessing the potential air quality impacts from residential and commercial developments. The protocol is designed to give the Imperial County specific guidelines that identify when an air quality analysis is necessary, the type of analysis that should be performed, the significance of the impacts predicted by the analysis, and the mitigation measures needed to reduce the overall air quality impacts. It is the intention of this document to make the preparation of the air quality analysis portion of any environmental document consistent with the rules and regulations governing this district and those found within the guidelines of the CEQA.

The provisions contained herein are not intended to replace the terms of CEQA or it's Guidelines. In the event that any of the following procedures conflict with the provisions of CEQA or the Guidelines, the provisions of CEQA or it's Guidelines shall control.

2. Introduction

Clean air is vital to the health and welfare of every citizen of this country. The residents of Imperial County have an inherent right to clean air. To answer the call of maintaining clean air, the legislature has given local air districts regional authority over the control of air pollution from all sources other than emissions from motor vehicles. Rightly so, the Air District has regulatory control over many stationary sources of air contaminants. These stationary sources are divided into point sources, such as factories, geothermal plants and rock quarries, and area sources, such as paved and unpaved roads, open areas, construction projects, which have emissions that fit a generalized category and are considerably too small to warrant permitting. Generally speaking, direct sources of air contaminants are required to obtain specific operational permits from the Air District while indirect sources are exempt. Indirect sources are facilities as well as land uses which do not emit a significant amount of pollution on their own but attract or generate motor vehicle trips which result

[1]Throughout this document the term Air District refers to the Imperial County Air Pollution Control District.

in emissions of ozone precursors, carbon monoxide and fine particulate matter.

For Imperial County, the department of Planning/Building, developed its CEQA "Rules and Regulations." Typically, the Planning/Building department acts as the lead agency for all residential and commercial development projects. The lead agency reviews all project applications subject to CEQA and makes the determination whether a project is categorically exempt or statutorily exempt from CEQA requirements. If the project is not exempt, the lead agency prepares an Initial Study to determine whether an Environmental Impact Report (EIR), a Mitigated Negative Declaration or a Negative Declaration must be prepared. According to CEQA statutes, sections 21153 and 15366.1, a lead agency is required to seek comments from each responsible agency and any public agency that has jurisdiction by law over resources that may be affected by a proposed project[2]. The Initial Study is presented to the Environmental Evaluation Committee (EEC) for review. The EEC will determine, by vote, whether an EIR, Mitigated Negative Declaration, or Negative Declaration, is required for the project and will cause the appropriate document to be prepared.

This handbook is designed to give lead agencies, EEC members, air district staff, and petitioners specific guidelines that identify when an air quality analysis is necessary, the type of analysis that should be performed, the significance of the impacts predicted by the analysis, and the mitigation measures needed to reduce the overall air quality impacts. As stated earlier, it is the intention of this document to make the preparation of the air quality analysis portion of any environmental document consistent with the rules and regulations governing this district and those found within the guidelines of CEQA. The air district's handbook is solely an air quality guidance document. To address the overall general CEQA process, the lead agencies, EEC members, air district staff, and petitioners should follow the Planning/Building Department's guidance manual entitle "Rules and Regulations to Implement California Environmental Qaulity Act (CEQA) as Amended."

3 Role of the Air District within the CEQA Process

Typically, the Air District acts as a responsible agency or commenting agency under CEQA for residential and commercial projects. The Air District acts as a responsible agency when it has discretionary approval authority (as a member of the EEC) over a project, but does not have the primary responsibility for carrying out a project. The Air District acts as the responsible agency when development projects require general approval and an Air District Permit. As a responsible agency, the Air District may coordinate the environmental review process with the Air District's permitting process. During this coordinated process the Air District should provide comments to the lead agency regarding potential impacts and recommend mitigation measures. Conversely, the Air District acts as a commenting agency when it is not designated as a lead or responsible agency. Under the auspice of this title the Air District may have concerns about the air quality impacts of a proposed project. As a commenting agency, the Air District reviews environmental documents

[2]Health and Safety code section 40000 grants local and regional authorities the legal jurisdiction over control of air pollution from all sources, other than emissions from motor vehicles. The Imperial County Air Pollution Control District has the primary responsibility for the control of air pollution from all sources other than emissions from motor vehicles.

prepared for development proposals and provides significant comments to the lead agency as they pertain to air quality impacts and mitigation measures.

In all cases, the primary concern of the Air District is guidance. The guidance the Air District provides is primarily to mitigate adverse impacts to air quality from development projects within the Imperial County. For most urban development proposals, this typically involves projects where the vehicle trip generation is enough to potentially cause high emission levels which may hinder the Air District's efforts in attaining and maintaining the Federal and State ambient air quality standards.

4 Thresholds of Significance

Generally speaking, a proponent of a development project has to submit an application to the designated lead agency for a preliminary review. According to CEQA guidelines, if the lead agency can clearly determine, during the preliminary review process, that an EIR is required the agency may, under it's discretionary powers, skip further initial review and begin work directly on the EIR process[3]. However, under most circumstances, upon completion of the preliminary review the development of an Initial Study is conducted. The preparation of the Initial Study serves as an indicator for the need to develop an EIR, Mitigated Negative Declaration or a Negative Declaration[4]. If an EIR is required then the Initial Study serves to identify any significant effects upon the environment that are to be analyzed. This section describes the Air District's recommended thresholds of significance to be used to evaluate the air quality impact of a project when preparing an Initial Study. If the Initial Study indicates that any of the following thresholds may be exceeded, then an EIR should be prepared in order to more accurately evaluate the project impacts and to identify mitigation measures.

The procedures and thresholds of significance of this air quality guidance handbook do not apply to projects which are specifically exempt within the CEQA Guideline, Sections 15260-15285 (Statutory Exemptions) and 15300-15332 (Categorical Exemptions).

For determining the significance of project impacts the Air District has established four separate evaluation categories. CEQA requires full disclosure of the potential air pollutants and/or toxic air emissions from a project to properly assess these evaluations:

a) Comparison of calculated project emissions to Air District emission thresholds;
b) Consistency with the most recent Clean Air Plan for Imperial County[5];
c) Comparison of predicted ambient pollutant concentrations resulting from the project

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[3]Found in Article 5 section 15060 (d) of the CEQA guidelines.

[4]According to the CEQA guidelines another purpose for the Initial Study is to enable an applicant to qualify for a Negative Declaration by modifying a project through mitigation measures of adverse impacts before an EIR is prepared. CEQA guidelines section 15063(c)(2).

[5]Clean Air Plan or Clean Air Plans indicates the most recent PM10 and Ozone attainment Plans for Imperial County.

to state and federal health standards, when applicable; and

d) The evaluation of special conditions which apply to certain projects.

4.1 Thresholds of Significance for Project Operations

This section includes the recommended threshold criteria for determining whether an EIR or a Mitigated Negative Declaration should be prepared for a development project. From the Air District's perspective, the Initial Study of a development project should only consider long-term emissions or project operation emissions when determining the level of significance. Short-term emissions or construction emissions need not be considered to determine the level of significance of a project; however, the Initial Study should propose mitigation measures for those activities. Guidelines for analysis and mitigation measures for construction activities are presented in Section 7.1.

Table 1 provides general guidelines for determining the significance of impacts and the recommended type of environmental analysis based on the total emissions that are expected from a project operation .

Table 1, Thresholds of Significance for Project Operations

Pollutant	Tier I	Tier II
NOx and ROG	**Less than 55 lbs/day**	**55 lbs/day and greater**
PM10 and SOx	**Less than 150 lbs/day**	**150 lbs and greater**
CO	**Less than 550 lbs/day**	**550 lbs/day and greater**
Level of Significance	**Potentially Significant**	**Significant Impact**
Environmental Document	**Mitigated Negative Declaration**	**EIR**

Tier I Less than 55 lbs/day of NOx or ROG; less than 150 lbs/day of PM10 or SOx; or less than 550 lbs/day of CO

Any residential or commercial development project with a potential to emit less than 55 lbs/day of NOx or ROG; less than 150 lbs/day of PM10 or SO_2; or less than 550 lbs/day of CO could potentially have an adverse impact on the local air quality. From the Air District's perspective, residential and commercial developments with a potential to emit below this level will ***not*** be required to develop an EIR. However, the Initial Study should require implementation of all the standard mitigation measures listed in Section 7.2 in order to reduce the air quality impact to an insignificant level. It is important to note that the strategies identified in Section 7.2 do not represent a comprehensive list of all mitigation measures. The project proponent, the lead agency or the Air District may propose alternative mitigation measures that are capable of providing the same level of mitigation. The Air District requires that alternative mitigation measures be fully documented with a copy of the documentation attached to the Initial Study.

Tier II 55 lbs/day or greater of NOx or ROG; 150 lbs/day or greater of PM10 or SOx; or 550 lbs/day or greater of CO

Any residential or commercial development project with a potential to emit 55 lbs/day or greater of NOx or ROG; 150 lbs/day or greater of PM10 or SOx; or 550 lbs/day or greater of CO will have a significant impact on the local air quality. In this instance the Air District requires the preparation of an EIR. ***For projects exceeding any of these thresholds, the project proponent should select and implement all feasible discretionary mitigation measures in addition to the standard mitigation measures.*** Sections 7.2 and 7.3 both provide a set of standard and discretionary mitigation measures that a project proponent could implement in order to reduce the air quality impacts to an insignificant level. For large development projects in which emissions cannot adequately be mitigated solely with on-site mitigation measures, the project developer should propose to implement off-site mitigation measures in order to reduce potential air quality impacts to a level of insignificance. Section 7.4 provides a set of off-site mitigation measures that could be implemented by the project proponent. It is important to note that the strategies identified in Sections 7.2 through 7.4 do not represent a comprehensive list of all mitigation measures. The applicant may propose to implement alternative mitigation measures that are capable of providing the same level of mitigation[6]. The Air District requires that alternative mitigation measures be fully documented and attached to the EIR.

4.2 Thresholds of Significance for Construction Activities

Construction-related emissions are generally short-term in duration, but may still cause temporary adverse air quality impacts. With respect to construction activities particulate matter (PM10) is the pollutant of greatest concern which includes but is not limited to: excavation, grading, demolition, vehicle travel on paved and unpaved surfaces, and vehicle and equipment exhaust emissions. Construction-related emissions can cause substantial increases in localized concentrations of PM10. Construction emissions of PM10 can vary greatly depending on the level of activity, the specific operations taking place, the equipment being operated, local soils, weather conditions as well as other factors. Despite this variability in emissions, experience has shown that there are a number of feasible control measures that can be reasonably implemented to significantly reduce PM10 emissions from construction activities.

The Air District's approach to CEQA analyses of construction impacts is to emphasize implementation of effective and comprehensive control measures rather than producing a detailed evaluation of the emissions. From the Air District's perspective, evaluation of construction emissions is not necessary (however this does not preclude a lead agency from electing to do so), unless the project is required to prepare an EIR. The EIR should quantify emissions from construction activities, such as fugitive PM10 and exhaust emissions from construction equipment. Mitigation measures should be proposed for these activities.

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[6] Elsewhere in the document applicant, project proponent, petitioner all refer to an individual who has a vested interest in a favorable outcome for a development project and who is physically submitting the appropriate paper work for approval of the project.

Regardless of size, the standard mitigation measures for construction equipment and fugitive PM10 control for construction activities should be implemented at all construction sites. In addition, all the discretionary mitigation measures for fugitive PM10 control should be implemented at construction sites greater than, or equal to, four (4) acres. Section 7.1 provides a set of standard and discretionary mitigation measures for construction equipment and fugitive PM10 control for construction activities that the project proponent could implement in order to reduce the air quality impacts to an insignificant level. The measures identified in Section 7.1 do not represent a comprehensive list of all mitigation measures. The project proponent or the lead agency may propose alternative mitigation measures that are capable of providing the same level of mitigation. The Air District requires documentation of all alternative mitigation measures and a copy of the documentation should be attached to the Initial Study.

Compliance with the requirements of this CEQA guidance does not preclude the project from compliance with the Imperial County Air Pollution Control District Rules and Regulations. Any project shall be required to comply with all the requirements of the district's rules and regulations, specifically the requirements of Regulation VIII for the construction phase.

4.3 Screening Criteria for Project Impacts

Project screening is intended to allow for accurate and rapid evaluation of a proposed project's potential to exceed the Air District's CEQA emission thresholds of significance. The lead agency may consult Table 2 for an indication as to whether the thresholds for EIR applicability requirements for a particular project might be exceeded. The criteria used to evaluate air emissions associated with residential and commercial projects is based primarily on the combustion emissions generated by motor vehicles and area source emissions (paved and unpaved roads, construction projects, open areas, etc). The URBEMIS model was used to evaluate the emissions associated to these projects[7]. The list is not comprehensive and should be used for general guidance only. The petitioner is encouraged to develop a more refined analysis of air quality impacts specific to a particular project, especially for those projects exceeding the screening thresholds. The latest URBIMIS model is recommended for use in the evaluation of air quality impacts.

For those development projects not included in Table 2, it is highly recommended that the lead agency and the Air District consult together on EIR applicability requirements for any given project or that a request is made to the petitioner for an estimate of the air emissions that will be generated by the project.

[7]URBEMIS is a planning tool for estimating vehicle travel, fuel use and resulting emissions related to land use projects. The model is used to calculate emissions of ROG, CO, NOX and PM10 from vehicle use associated with specific construction developments.

Table 2, Screening Criteria for Project Air Quality Impacts

Land Use	Units of Measure	Trip Generation Rate (1)	Project Size which Would Generate Air Emissions Greater than the Threshold Limit (2)
Single Family	Dwelling Unit	10.37	200 Units
Apartments	Dwelling Unit	5.93	340 Units
Condominiums	Dwelling Unit	5.40	350 Units
Mobile Home Park	Dwelling Unit	5.47	320 Units
Supermarket	1000 sq. ft	111.51	29.5 sq.ft.
Restaurant, Quality	1000 sq. ft	97.27	31 sq.ft.
Restaurant, Fast Food	1000 sq. ft	685.61	4.4 sq.ft.
Motel	No. Rooms	8.70	360 Rooms

(1) Trip generation rates in this table are from the Institute of Transportation Engineers (ITE) Trip Generation Rate Tables for Rural Areas.

(2) Emissions are defined as NOX, ROG, CO or PM10.

4.4 Consistency with the Most Recent Clean Air Plan for Imperial County

Within the CEQA guidelines, Section 15125 (b) requires that an EIR discuss consistency between the proposed project and the applicable regional plans. A consistency analysis with the Clean Air Plans is required for large residential developments and large commercial developments which are required to develop an EIR. The EIR should demonstrate compliance of the project with the most recent Ozone and PM10 Attainment Demonstration Plans. The EIR should also demonstrate compliance of the project with the Imperial County Rules and Regulations, as well as the State and Federal Regulations.

4.5 Comparison of Predicted Ambient Pollutant Concentrations to State and Federal Air Quality Standards.

To protect the public health and welfare, the State and Federal government established Ambient Air Quality Standards for certain pollutants, known as criteria pollutants. Large residential and commercial projects are sometimes required to develop air quality dispersion modeling if it is determined that the project emissions have the potential to cause an exceedance of the Ambient Air Quality Standards. A project is considered to have a significant impact if its emissions are predicted to cause or contribute to a violation of any Ambient Air Quality Standard. The petitioner should

identify in the EIR any on-site and off-site control measures which reduce the concentration of air emissions below the Ambient Air Quality Standards.

4.6 Special Conditions

Project impacts may also be considered significant if one or more of the following special conditions apply:

a. Development projects located in close proximity to sensitive receptors or with a potential to emit toxic or hazardous air pollutants, even at a very low level of emissions, may be considered significant because of the increased cancer risk for the affected population. Such projects may be required to prepare a health risk assessment to determine the potential level of risk associated with their operations. The Air District should be consulted on any project with the potential to emit toxic or hazardous air pollutants. In addition, pursuant to the requirements of California Health and Safety Code 42301.6 (AB 3205) and Public Resources Code Section 21151.8, subdivision (a)(2), any new school, or proposed industrial or commercial project site located within 1000 feet of a school must be referred to the Air District for review.

b. If a determination is made that a development project has the potential to cause a nuisance problem which impacts a considerable number of people the project may be considered as having a significant effect. There are projects that may emit pollutants in concentrations that would not otherwise be significant except as a nuisance, such as hydrogen sulfide.

If a project is proposed within the screening level distance in Table 3, the Air District should be contacted for information regarding potential odor problems. For projects that involve new receptors located near an existing odor source(s), a public information reviewing request should be submitted to the Air District for a review of any existing odor complaints and for the nearest odor emitting facility(ies).

Table 3, Project Screening Distances for Potential Odor Sources

Type of Operation	Project Screening Distance
Wastewater Treatment Plant	1 mile
Sanitary Landfill	1 mile
Composting Station	1 mile
Feedlot	1 mile
Asphalt Plant	1 mile
Painting/Coating Operations (auto body shops)	1 mile
Rendering Plant	1 mile

5 Methods for Calculating Project Emissions

Air pollutant emissions from an urban development can derive from a variety of sources, including but not limited to motor vehicles, natural gas, electric energy use, combustion-powered utility equipment, paints and solvents, equipment or operations used by various commercial and industrial facilities, construction and demolition equipment and operations, as well as various other sources. The amount and type of emissions produced, and their potential to cause significant impacts, depends on the type and level of development proposed. The following sections describe the recommended methods generally used to calculate emissions from residential and commercial projects.

5.1 Motor Vehicle Emissions

Motor vehicles are the primary source of long-term emissions caused by residential and commercial land uses. These land uses often do not directly emit significant amounts of air pollutants, but cause or attract motor vehicle trips that do produce emissions. Such land uses are referred to as indirect sources.

Motor vehicle emissions associated with indirect sources should be calculated for projects which exceed the screening criteria listed in Table 2, Screening Criteria for Project Air Quality Impacts. Calculations should be based on the most recent vehicle mission factors (EMFAC series) provided by the California Air Resources Board (ARRB), and trip generation factors published by the Institute of Transportation Engineers (ITE). These factors have been incorporated into a simple computer model called URBEMIS, originally developed by the ARB. URBEMIS incorporates the EMFAC emission factors and ITE trip rates.

URBEMIS is a planning tool for estimating vehicle travel, fuel use and resulting emissions related to land use projects. The model calculates emissions of ROG, CO, NOX and PM10 from vehicle use associated with new or modified development such as shopping centers, housing, commercial services and industrial land uses. URBEMIS allows users to compare motor vehicle emissions as a function of the number of vehicle trips associated with a given land use and the vehicle miles traveled for each particular type of trip taken. The calculated emissions can then be used as a basis for project screening.

User-specific inputs to the model include project type, year, season, trip speed and other parameters. The default values should be used when no other project specific information is available. If different values are used, justification and documentation for the inputs should be provided on the appropriate document. The Air District is currently working on incorporating the default values for Imperial County.

The Air District recommends using the most recent version of URBEMIS adopted by the Air Resources Board and the corresponding version of EMFAC. A link to the most recent version of URBEMIS can be accessed from the Air Resource Board website at www.arb.ca.gov. As an alternative, the petitioner may choose to manually evaluate the air emissions associated with a particular project.

A thorough emissions analysis should be performed on all relevant emission sources, using emission factors from EPA document AP-42 "Compliance of Air Pollutant Emission Factors", the latest version of ENFAC, or other approved source(s). The emission analysis should include calculations for estimated emissions of all criteria pollutants and toxic substances released from the project. Documentation of emission factors and all assumptions should be provided.

6. Preparing the Air Quality Analysis Section for Environmental Impact Reports

For large projects requiring the preparation of an EIR, a comprehensive air quality analysis is required as part of the EIR document. Such an analysis should address both the construction phase and the operational phase impacts of the project and include, as a minimum, the following information:

a. A description of existing air quality and emissions in the impact area, including the attainment status of the Air District relative to State and Federal air quality standards and any existing regulatory restrictions to development. Included should be data from the air quality monitoring station(s) closest to the project site. The most recent Clean Air Plans should be consulted for applicable information.

b. A thorough emission analysis should be performed on all relevant emission sources, using emission factors from EPA document AP-42 "Compliance of Air Pollutant Emission Factors", the latest version of ENFAC, or other approved source(s). The emission analysis should include calculations for estimated emissions of all criteria pollutants and toxic substances released from the anticipated land mix on a daily and yearly basis. Documentation of emission factors and all assumptions (i.e. anticipated land uses, average daily trip rate from generation studies, etc) should be provided as an appendix to the EIR.

c. The EIR should include a range of alternatives to the proposed project that could effectively minimize air quality impacts, if feasible. A thorough emissions analysis should be conducted for each of the proposed alternatives identified. The EIR author should contact the Air District if additional information and guidance is required. All calculations and assumptions used should be fully documented in an appendix to the EIR.

d. A diesel exhaust screening level health risk assessment should be performed in consultation with the Air District engineering staff for projects that will result in significant use of heavy-duty diesel equipment in areas with potential for human exposure, especially when exposures to sensitive receptors are likely. Factors that will be considered by the Air District staff when determining if a screening risk analysis is necessary should include the expected emissions from diesel equipment, location of the project and distance to sensitive receptors.

e. For those projects with a potential to generate heavy volumes of traffic and which can lead to high levels of CO, hot spot modeling should be used to determine compliance with the state CO standard at the intersections and/or roadway links that will be most impacted by the proposed project. The "hot spots" should be determined according to the traffic impact analysis. One of the most common models is CALINE4, developed by and available from the California Department of Transportation; however, any other APCD approved hot spot

model can be used. If the results from the air modeling indicates a significant impact, mitigation measures should be identified and incorporated into the EIR. The effectiveness of any proposed mitigation measure(s) should be quantified by estimating the effects of the measure(s) on the volume of traffic and/or speeds, and CO concentrations.

f. A cumulative impact analysis should be performed to evaluate the combined air quality impacts of any given project and the impacts from existing and proposed future developments in the area. This should encompass all planned construction activities within 1 mile of the project.

g. The EIR should evaluate the project for consistency with the Clean Air Plan and the District's Rules and Regulations.

h. Temporary construction impacts, such as fugitive dust and combustion emissions from construction and grading activities, should be quantified and mitigation measures proposed.

i. Mitigation measures should be recommended, as appropriate, following the guidelines of this handbook.

7. Mitigation Measures

An EIR should identify each significant air quality impact and propose feasible mitigation measures that would reasonably be expected to reduce impacts to below significant levels. In addition, a Mitigated Negative Declaration should identify measures included as part of the project to reduce impacts on air quality to less than significant.

This section contains a menu of mitigation measures that project proponents and local governments can use to select those measures that are feasible to mitigate the project's impact. According to CEQA Guidelines, Section 15364, feasible means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. Lead agencies are responsible for determining the feasibility of mitigation measures. In instances when a project has a significant impact, CEQA requires that feasible mitigation measures be applied to the project in order to reduce cumulative impacts and to reduce individually significant impacts. The district considers a project to be mitigated to a level of insignificance if its impact is mitigated below the threshold levels in Section 4. A project which incorporates all feasible mitigation measures and/or CEQA options for mitigation (refer to CEQA Guidelines, Section 15370 (a)(e)) is considered to have substantially mitigated air quality impacts pursuant to CEQA Guidelines, Section 15093 (b). However, if the project's emissions are still over the significance level and the agency decides to approve the project, the lead agency must prepare a Statement of Overriding Considerations pursuant to CEQA.

This section recommends feasible measures that can reasonably be expected to reduce air quality impacts from construction, indirect sources, localized carbon monoxide impacts, and cumulative impacts. The mitigation measures in this section are intended to reduce emissions of ROG, NOx, PM10, and CO.

The Standard Mitigation Measures for construction equipment and fugitive PM10 control for construction activities should be implemented at all construction sites, as appropriate and feasible, regardless of the size. In addition, discretionary mitigation measures for fugitive PM10 control should be implemented, as appropriate and feasible, at construction sites greater than, or equal to, four (4) acres.

7.1 Construction Equipment and Fugitive PM10 Mitigation Measures

Listed below are a number of fugitive dust mitigation measures which have been shown to significantly reduce emissions. It should be noted that the following examples are not considered exclusive. The Air District is aware that there are other mitigation measures with similar or better emission reduction potentials. Use of other mitigation measures may also be considered if the appropriate documentation is provided.

Standard Mitigation Measures for Construction Equipment

a. Maintain all construction equipment in proper tune according to manufacturer's specifications.
b. Fuel all off-road and portable diesel powered equipment, including but not limited to bulldozers, graders, cranes, loaders, scrapers, backhoes, generator sets, compressors, auxiliary power units, with ARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road).
c. Maximize to the extent feasible, the use of diesel construction equipment meeting the ARB's 1996 or newer certification standard for off-road heavy-duty diesel engines.
d. Install diesel oxidation catalysts (DOC), catalyzed diesel particulate filters (CDPF) or other District approved emission reduction retrofit devices.

Standard Mitigation Measures for Fugitive PM10 Control

a. The entire site shall be pre-watered for 48 hours prior to clearing and grubbing..
b. Reduce the amount of the disturbed area where possible.
c. Water at least twice daily or otherwise stabilize all active construction areas.
d. All dirt stock-pile areas should be sprayed daily as needed.
e. Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites.
f. Haul trucks shall covered loads or maintain al least 6" of freeboard when traveling on public roads.
g. Pre-moisten, prior to transport, import and export materials that have a silt content of 5% or grater. Water all materials with a silt content of 5% or greater with a spray bar or cover trucks hauling dirt, sand, or loose materials. Empty trucks and trucks carrying asphalt material are excluded from this requirement.
h. Sweep streets at the end of each day if visible soil material is carried onto streets, or wash off truck and equipment leaving the site.

Discretionary Mitigation Measures for Fugitive PM10 Control

a. Use of water trucks or sprinkler system in sufficient quantities to prevent airborne dust from leaving the site. When wind speeds exceed 15 mph the operators shall increase watering frequency.
b. Apply chemical soil stabilizers or apply water to form and maintain a crust on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days).
c. Apply non-toxic binders (e.g. latex acrylic copolymer) to exposed areas after cut and fill operations and hydroseeded areas.
d. Plant vegetative ground cover in disturbed areas as soon as possible and where feasible.
e. Cover or apply water or chemical suppressants to form and maintain a crust on inactive storage piles.
f. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
g. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.
h. Install wheel washers, rumble gates, provide a gravel pad or pave the area where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site.

7.2 Standard Mitigation Measures for Project Operations

The recommended standard air quality mitigation measures have been separated according to land use and mitigation type.

According to Table 1, Tier I, projects generating less than 55 lbs/day of NOx or ROG; less than 150 lbs/day of PM10 or SOx; or less than 550 lbs/day of CO han 55 lbs/day, the Initial Study should require implementation of all the Standard Mitigation Measures in order to reduce the air quality impact to an insignificant level.

According to Table 1, Tier II, projects generating* 55 lbs/day or greater of NOx or ROG; 150 lbs/day or greater of PM10 or SOx; or 550 lbs/day or greater of CO, the EIR *should select and implement all feasible and practicable measures from the discretionary list, in addition to the Standard Mitigation Measures.

Residential Projects

Standard mitigation recommendations for residential projects include the following site design and energy efficiency standards:

Standard Site Design Measures

a. Link cul-de-sacs and dead-end streets to encourage pedestrian and bicycle travel;
b. Allocate easements or land dedications for bikeways and pedestrian walkways; and
c. Provide continuous sidewalks separated from the roadway by landscaping and on-street

parking. Adequate lighting for sidewalks must be provided, along with crosswalks at intersections.

Standard Energy Efficiency Measures

a. Increase the building energy efficiency rating by 10% above what is required by Title 24 requirements. This can be accomplished in a number of ways (increasing attic, wall or floor insulation, etc.).

Commercial Projects

Standard mitigation recommendations for commercial and industrial projects include the following site design and energy efficiency standards:

Standard Site Design Measures

a. Provide on-site bicycle parking;
b. Provide on-site eating, refrigeration and food vending facilities to reduce lunchtime trips;
c. Provide shower and locker facilities to encourage employees to bike and/or walk to work.
d. Provide for paving a minimum of 100 feet from the property line for commercial driveways that access County paved roads as per County Standard Commercial Driveway Detail 410B (formerly SW-131A).

Standard Energy Efficiency Measures

a. Increase building energy efficiency rating by 10% above what is required by Title 24 requirements. This can be accomplished in a number of ways (increase attic, wall or floor insulation, etc).

7.3 Discretionary Mitigation Measures

The discretionary mitigation measures listed in this section have been separated according to land use and mitigation type. It is important to note that the strategies identified here do not represent a comprehensive list of all mitigation measures possible. Project proponents are encouraged to propose other alternatives that are capable of providing the same level of mitigation.

Residential Projects

Discretionary Site Design Measures

a. If the project is located on an established transit route, improve public transit accessibility by providing transit turnouts with direct pedestrian access to project.
b. Increase street tree planting.
c. Outdoor electrical outlets to encourage the use of electric appliances and tools.
d. Secure on-site bicycle parking for multi-family residential developments.
e. Increase the number of bicycle routes/lanes.

f. Provide pedestrian signalization and signage to improve pedestrian safety.

Discretionary Energy Efficiency Measures

a. Use roof material with a solar reflectance value meeting the EPA/DEO Energy Star® rating to reduce summer cooling needs.
b. Use high efficiency gas or solar water heaters.
c. Use built-in energy efficient appliances.
d. Use double-paned windows.
e. Use low energy street lighting (i.e. sodium).
f. Use energy efficient interior lighting.
g. Use low energy traffic signals (i.e. light emitting diode).
h. Install door sweeps and weather stripping if more efficient doors and windows are not available.

Commercial Projects

Discretionary Site Design Measures

a. Increase street tree planting
b. Shade tree planting in parking lots to reduce evaporative emissions from parked vehicles.
c. Increase number of bicycle routes/lanes.
d. If the project is located on an established transit route, improve public transit accessibility by providing transit turnouts with direct pedestrian access to protect or improve transit stop amenities.
e. Implement on-site circulation design elements in parking lots to reduce vehicle queuing and improve the pedestrian environment.
f. Provide pedestrian signalization and signage to improve pedestrian safety.

Discretionary Energy Efficiency Measures

a. Use roof material with a solar reflectance value meeting the EPA/DOE Energy Star® rating to reduce summer cooling needs.
b. Use built-in energy efficient appliances, where applicable.
c. Use double-paned windows.
d. Use low energy parking lot and street lights (i.e. sodium).
e. Use energy efficient interior lighting.
f. Use low energy traffic signals (i.e. light emitting diode).
g. Install door sweeps and weather stripping if more efficient doors and windows are not available.
h. Install high efficiency gas/electric space heating.

7.4 Off-site Mitigation Measures

Off-site mitigation measures are designed to offset emissions from large projects that cannot be fully mitigated with on-site measures. Off-site emissions reductions can result from either stationary or

mobile sources, but should relate to the on-site impacts from the project in order to provide proper "nexus" for the air quality mitigation. For example, NOX emissions from increased vehicle trips from a large residential development could be reduced by funding the expansion of existing transit services. The off-site strategies identified below provide a range of options available to mitigate significant emission impacts from large projects.

a. Retrofit existing homes in the project area with energy-efficient devices.
b. Retrofit existing businesses in the project area with energy-efficient devices.
c. Fund a program to buy and scrap older, higher emission passenger and heavy-duty vehicles.
d. Replace/repower transit buses.
e. Replace/repower heavy-duty diesel school vehicles (i.e. bus, passenger or maintenance vehicles).
f. Fund an electric lawn and garden equipment exchange program.
g. Retrofit or repower heavy-duty construction equipment, or on-road vehicles.
h. Repower or contribute to funding clean diesel locomotive main or auxiliary engines.
i. Install bicycle racks on transit buses.
j. Purchase particulate filters or oxidation catalysts for local school buses, transit buses or construction fleets.
k. Install or contribute to funding alternative fueling infrastructure (i.e. fueling stations for CNG, LPG, conductive and inductive electric vehicle charging, etc.).
l. Fund expansion of existing transit services.
m. Fund public transit bus shelters.
n. Subsidize vanpool programs.
o. Subsidize transportation alternative incentive programs.
p. Contribute to funding of new bike lanes.
q. Install bicycle storage facilities.
r. Provide assistance in the implementation of projects that are identified in a city or county Bicycle Master Plan.

Received
1/21/05

Venezia Estates
Tentative Tract Map
Review and Analysis Comments
Public Works/Engineering Department

January 21, 2005
UA2004-34

RECEIVED
01/21/05
CITY OF CALEXICO
PLANNING DEPARTMENT

I. Street Circulation Element Issues and Impact

1. Highway 98 connection should be made at vicinity of Jade Ave. of the Tierrasanta Subdivision. The future road connection from this proposal should be compatible with the already approved Jade Ave. connection by Caltrans. The proposed east-west street identified in the map as Calle Vernier will need to provide **84' R/W** width. This street alignment is at issue that there has not been any progress made with the owner of Tierrasanta Subdivision and Caltrans. The Owner/Developer shall be required to contact, mitigate, and secure an approved allgnment and connection with Hwy 98 from Caltrans and the owner of the Tierrasanta Subdivision development.

2. Bowker Road need to be extended to include the **bridge widen** at Highway 98 to include the **All American Canal**. The bridge and highway combine alignment is approximately 350 feet in length by 100 feet in width on Bowker Road. **Additionally, Hwy 98 widening to four lanes** may be required on both side. **Fair share** cost will be determined as part of the **Eastside Calexico Facilities II Study** undertaken by the CM Ranch development.

3. Layout of street pattern should be in compliance with the City's General Plan Circulation Element (i.e. **Jade Ave.** connection as identified in Item 1 above).

4. Identify other collector streets with the adjacent development layouts such as the City's master plan concept that is currently under development. Calle De Camaro south bound will have to be connected thru to Second Street at the South.

5. Provide street connection of **75 feet R/W north-south street** connection at approximately 1,000 feet west of the eastside tract boundary. The City is currently making the design coordination between these two developments to comply with the City's Street Circulation Element.

6. Prepare a revised Tentative Map with the final resolution of the street alignment identified above.

II. Traffic Issues and Impact Analysis

This section will be discussed and analyzed by the City Traffic Engineer in a separate letter report document. He received the copy of the latest traffic report on 1-21-05 and is in the process of reviewing the report and preparing the responses this weekend.

III. Drainage Element Issues and Impact

1. Integrate retention basin design with the City's master plan of retention basins to accompany the Regional Retention Basin Concept. This will be maintained by setup of a community facility district.

2. Prepare a master drainage plan to comply with the City's current design standard and criteria.

IV. Sewer Element Issues and Impact

1. The of-site trunk sewer line and the Regional Pump Station that the development connects at Bowker Road are not available yet. This development will need to coordinate with the City's master plan of sewer development in order to arrive a proper priority and the schedule of the availability for both developments. The pump station at Tierrasanta Unit 1 is not adequate to accommodate this development. Additionally, its force main to Highway 98 and Meadows Road has not yet been built. The gravity line at Sapphire Street may not have adequate depth for this development without a major reconstruction of the Tierrasanta Subdivision gravity sewer line and the upgrade of the Lift Station including the force main (FM) line.

2. Prepare a sewer master plan that is in accordance with the City's master sewer plan and to ascertain that the trunk gravity line will be able to accompany the flow, or to upgrade the Tierrasanta Unit 1 pump station and its gravity line and the yet to be built force main (FM) to receive the flows from this development. Submit a sewer feasibility study as part of the Tentative Map submittal. All costs shall be responsible by this development.

V. Water Element Issues and Impact

1. The City is currently proceeding on the construction phase of its Phase III

water master plan at the eastside. The **30-inch diameter line** running north at Bowker Road will benefit this development; however, a second waterline loop will be required at the eastside street tract boundary.

2. Prepare a water master plan that integrates with the City's Phase III and the CM Ranch water master plan.

3. Provide a second connection of proper size at the eastside to form a loop connection for the water master plan as stated in Item 1 above.

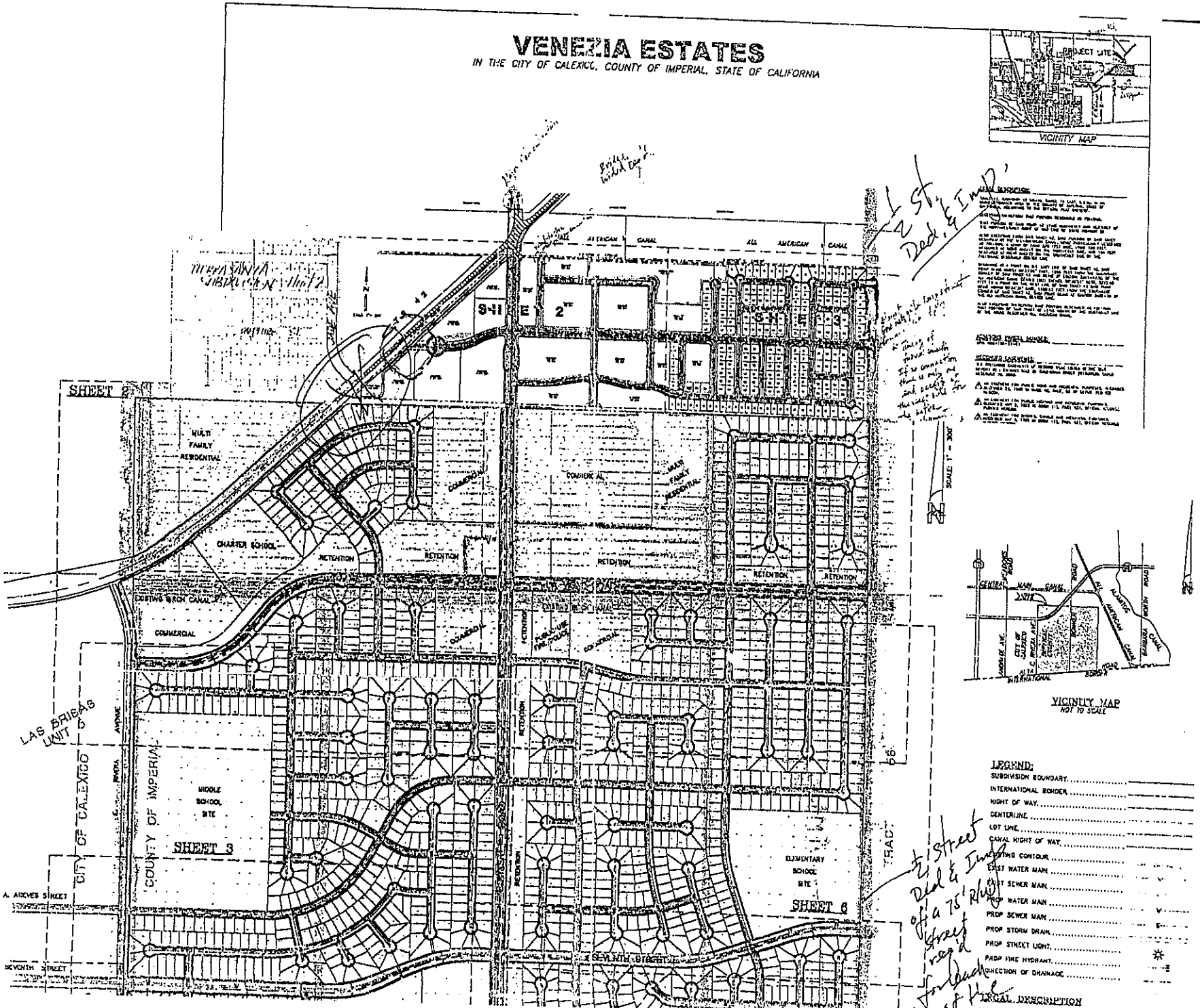
VI. Community Facility District

1. A cost participation for the regional infrastructure program (i.e. the **East Calexico Facilities Area II Improvement)** will be needed. This program is being addressed by the City's consultant on the CM Ranch development that will included but not limited to: **off-site streets, bridges at La Vigne Road and Bowker Road at the All American Canal, sewer distribution line and lift station., water, regional retention basins, and storm drain systems, etc.**

2. A maintenance and operation of the Regional Retention Basin for drainage will need to be addressed.

VENERIA ESTATES

IN THE CITY OF CALEXICO, COUNTY OF IMPERIAL, STATE OF CALIFORNIA



Received
1/24/05

Cpy to: City Manager
Interim City Mgr
Pub. Wks. Dir.
Tony Wong
Veronica
Tom Dubois
Planning Commission

Date: January 22, 2005
To: Ricardo Hinojosa, Planning Director
From: C. Hui Lai, City Traffic Engineer
CC: Tony Wong, City Engineer

Subject: Venezia Planned Community Traffic Study Report Review

I have reviewed the revised traffic study prepared by Linscott Law & Greenspan for the Venezia project. My findings and comments are as follows:

1. **Traffic counts need to be updated and adjustment factors recalculated.**

   In response to my comment review letter dated October 12, 2004, the revised traffic study has increased the existing traffic volumes that were counted in the summer by 40%. However, a review of the adjusted existing traffic volumes shown in Figure 3-2 of the revised traffic study reveals that not all the traffic data was adjusted by 40%.

   The following locations were not adjusted and will need to be increased by 40% to compensate for a lesser amount of traffic due to schools that were not in session and agricultural workers that do not work in the summer.

   a. S.R. 111 & Cole Road
   b. S.R. 111 and S.R. 98
   c. Rockwood Road and Cole Road.

2. **Heavy truck traffic routes need to be considered and thoroughly analyzed relative to traffic mitigation requirements**

   As stated in my review letter dated October 12, 2004 (Page Three, Number Four), truck traffic must be accounted for at intersections known to have significant heavy truck impacts. The revised traffic study fails to consider or identify impacts at intersections from heavy truck traffic.

   The study needs to be revised to analyze the effect of heavy truck traffic routes at intersections in order to develop appropriate mitigation, if impacts are significant.

3. **Year 2025 intersection traffic analysis is needed**

   In my review letter dated October 12, 2004, a Year 2025 intersection traffic analysis was requested. The revised study (Section 9.0, Year 2025 Analysis) indicates that because the Imperial County Traffic Model does not have peak hour traffic turning movement volume for intersections, no Year 2025 intersection traffic analysis was performed.

However, this type of analysis is possible using the peak hour turning movement analysis already provided in the study along with 2025 information available in the Imperial County Traffic Model.

The 2025 Intersection Traffic Analysis is necessary to properly analyze future traffic impacts from this project. Traffic congestion takes place primarily at intersections. Street segments typically do not experience traffic congestion except near intersection approaches. This was why I specifically asked for a Year 2025 intersection traffic analysis.

In addition to the City needing this information to analyze future traffic impacts from the project, Caltrans will also require this level of analysis. Caltrans will require an Encroachment Permit for the project in order to install traffic signals at the intersection of S.R. 98 and Bowker Road, as recommended by the study. As part of the Caltrans permit process, traffic signal warrant calculations will be required. For the intersection to be signalized, the traffic signal warrant calculations are based on Year 2025 traffic.

To ensure that the 2025 intersection traffic analysis is completed, I recommend that either the traffic study be revised to include the requested 2025 analysis or that the project applicant deposit a fee with the City. The City would then provide the needed traffic signal design services and prepare all the required traffic signal warrant studies, including the Year 2025 intersection traffic analysis.

4. **Jasper Road will need widening and traffic signalization**

Jasper Road provides alternate access to and from the project site. Therefore, the project shall also contribute a fair-share fee towards the widening of Jasper Road from S.R. 111 to Bowker Road and the new traffic signalization of the intersections of Jasper Road/S.R. 111 and Jasper Road/Bowker Road.

5. **Include CM Ranch project for cumulative impact analysis**

Section 6.0, Cumulative Project Traffic, of the revised study identified a total of 13 development projects for cumulative traffic analysis. However, the study did not include the CM Ranch project which is in very close proximity to Venezia project. Although the Environmental Impact Report (EIR) for the CM Ranch project is not completed at this time, the CM Ranch project is a significant development in the vicinity of the Venezia project. Therefore, the CM Ranch project traffic should be identified and analyzed in the cumulative section of the Venezia project traffic study.

An estimate of the traffic generated from the CM Ranch project along with any traffic data and analysis that has been performed for the CM Ranch project to date should be included in the final Venezia traffic study. If traffic data from the CM Ranch project is not readily available, the Venezia project shall contribute a fair-share fee toward additional traffic mitigation as required by the City.

6. **Widen S.R. 98 from Meadows Road to east of Bowker Road**

The traffic study recommends a fair-share contribution towards the widening of S.R. 98 to four lanes between Meadows Road and the western project boundary. In order to accommodate a left-turn lane for westbound traffic on S.R. 98 at Bowker Road, I recommend that the widening of S.R. 98 be extended at a minimum of 1,000 feet east of Bowker Road instead of terminating at the western project boundary.

7. **Align Project Commercial Access Entrance with Jade Avenue**

The project access entrance on S.R. 98 for the commercial portion of the project should align directly across the future Jade Avenue connection with S.R. 98. Caltrans has agreed with this future connection at S.R. 98 for the Tierrasanta Subdivision.

8. **Synchronize traffic signals along Bowker Road**

Due to the close proximity between the proposed traffic signals at Jasper Road/Bowker Road, Cole Road/Bowker Road, S.R. 98/Bowker Road and Bowker Road/Piazza San Marco, a 2-inch conduit with communication cables shall be installed along Bowker Road between Jasper Road and Piazza San Marco to synchronize these traffic signals.

9. **Recommended mitigation measures**

All the traffic mitigation improvements recommended on Pages 21 through 24 of the traffic study are acceptable.

MEMORANDUM

To:	Daniel Arvizo Development, Design & Engineering Inc.	Date:	January 28, 2005
From:	John Boarman and Stacey Rael	LLG Ref:	3-04-1451
Subject:	Response to Comments—Venezia Planned Community		

The following discussion is a response to the comments (dated January 22, 2005) received regarding the revised traffic study for the Venezia Planned Community dated January 10, 2005.

COMMENT 1: Existing Traffic Counts

RESPONSE: The locations on SR 111 were not increased by 40% as these counts were not completed during the summer months. As stated in the report (page 4), they were conducted in May 2003 and increased by 5% to account growth between the year 2003 and 2004.

The Rockwood Road / Cole Road intersection was increased by 40% as were all of the other intersections in the revised report.

COMMENT 2: Heavy Truck Traffic

RESPONSE: Heavy vehicle factors were applied to all of the intersections analyzed within the study area in the Highway Capacity Manual (HCM) analysis. The percentages were determined using the CALTRANS truck traffic counts as referenced in the report (page 5).

COMMENT 3: Year 2025 Intersection Analysis

RESPONSE: The Imperial County Traffic Model (ICTM) did not provide enough proximate information to adequately calculate the year 2025 peak hour volumes. More specifically, 2025 ADT volumes are required at all four legs of each intersection in order to calculate the peak hour volumes. Only four ADT volumes were available in the entire project study area from the ICTM. Any volumes calculated for the year 2025 would be laden with far-reaching assumptions and speculation that could not readily be justified.

We agree that a 2025 signal warrant analysis will be needed at the intersection of Bowker Road and SR 98 in the future. This analysis, however, would not necessarily need to be conducted as part of the report discussed here. In any event, we will be happy to include this analysis in the traffic study.

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Pasadena
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San Diego
Las Vegas

COMMENT 4: Jasper Road

RESPONSE: Jasper Road and the associated intersections were not included in the traffic study given the negligible contribution of traffic to Jasper Road. We are not adverse, however, to calculating the fair share contribution for the Venezia Planned Community.

COMMENT 5: CM Ranch Inclusion

The CM Ranch project was not included in the cumulative section of the traffic study based on a directive following a meeting between the City of Calexico and Design, Development Engineering representatives. The data available for the CM Ranch project, upon completion of the Venezia Planned Community Traffic Study, were not sufficient to enable its inclusion in the cumulative projects section of the report.

COMMENT 6: Widen SR 98

RESPONSE: No action necessarily required as this comment is a recommendation rather than a requirement.

COMMENT 7: Align Project Commercial Access Entrance

RESPONSE: CALTRANS has agreed with the future connection of SR 98 and the Tierrasanta Subdivision, however, upon completion of the Venezia Planned Community Traffic Study, the connector street was undefined thus the street was referred to as Project Access Point rather than Jade Avenue or Sapphire Road – the two possible connectors.

COMMENT 8: Synchronize Traffic Signals

RESPONSE: This comment is a recommendation to synchronize traffic signals and will be included in the Traffic Study.

COMMENT 9: Recommended Mitigation Measures

RESPONSE: No action required. The mitigation measures referred to in the report have been accepted.

( ) 352 - 6408.

County of Imperial

Building Roads into the Next Century

PUBLIC WORKS DEPARTMENT

TIMOTHY B. JONES
Director of Public Works, County Road Commissioner, County Surveyor, County Engineer, Solid Waste Operations, County-Wide Transit

Post-it® Fax Note 7671	Date 9 March 05	# of pages ▶ 2
To Daniel Arviso	From Stacey Reed	
Co./Dept. DDE	Co. LLG	
Phone #	Phone # (858) 300-8800	
Fax # (760) 352-6408	Fax # Call me once received.	

March 1, 2005

Ricardo Hinojosa, Planning Director
City of Calexico
608 Heber Avenue
Calexico, CA 92231

SUBJECT: Venezia Planned Community Traffic Study, City of Calexico

Dear Mr. Hinojosa:

This letter is in response to the above mentioned project prepared by Linscott Law and Greenspan and received February 15, 2005. The traffic study was reviewed and this department offers the following comments:

A. The proposed access through a 45 degree diagonal entrance at the intersection of Bowker Road and State Route 98 is not recommended due to sight distance problems for viewing traffic traveling from the west. It is suggested that the access be oriented as close to 90 degrees from the access road.

2. Sheet No. 3 – Existing road classifications:

   1. Meadows Road is classified as a Major Collector in the Imperial County Circulation Element.
   2. Bowker Road is classified as a Minor Arterial in the Imperial County Circulation Element. Additionally the posted speed is 55 miles per hour.
   3. Jasper Road is classified as a Major Collector in the Imperial County Circulation Element.
   4. Cole Road is classified as a Prime Arterial in the Imperial County Circulation Element. Additionally the posted speed is 55 miles per hour.
   5. State Route 111 posted speed is 65 miles per hour.

Sheet 18 – Year 2025 Analysis

1. Table 9-1 calls for Bowker Road future road classification south of State Route 98 as collector. This portion of Bowker Road should be minimally classified as a Minor Arterial.

Venezia Sewer Study

The sewer study was not included in this letter. A copy is available for review with the City's engineering department.

State of California - The Resources Agency
DEPARTMENT OF FISH AND GAME
Eastern Sierra/Inland Deserts Region
78078 Country Club Dr., Ste. 109
Bermuda Dunes, CA 92201
(760) 200-9419

ARNOLD SCHWARZENEGGER, Governor

March 23, 2005

Development Design & Engineering
C/O Tom Dubose
1122 State Street, #D
El Centro, CA 92243

Dear Mr. Dubose,

The Department of Fish and Game has reviewed the Negative Declaration for the Venezia Tentative Tract Map (SCH #2005021128). The proposed project would involve a total development of 79 farmland acres in the Imperial County to be planned for annexation and subdivision.

The project will impact the western burrowing owl (*Athene cunicularia)*, a California Species of Special Concern. The Department recommends that any burrows that cannot be avoided should be mitigated at a 2:1 ratio with artificial burrows located in an adjacent protected area that provides a minimum 6.5 acres per pair or solitary owl.

If you have any questions please contact Mr. James Sheridan at (760) 200-9419 Thank you for the opportunity to comment on this project.

Sincerely,

Kimberly Nicol
Senior Environmental Scientist

DEPARTMENT OF TRANSPORTATION
District 11 · 2829 Juan Street
P. O. BOX 85406, M.S. 50
San Diego, CA 92110-2799
PHONE (619) 688-6954
FAX (619) 688-4299

Flex your power!
Be energy efficient!

March 24, 2005

11-IMP-098
PM 34.4

Mr. Ricardo Hinojosa
City of Calexico – Planning
608 Heber Ave.
Calexico, CA 92231

RE: **Venezia Estates – Mitigated Negative Declaration (MND) (SCH 2005021128)**

Dear Mr. Hinojosa:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the Mitigated Negative Declaration (MND)for the proposed Venezia Estates development, to be located east of State Route 98 (SR-98) between Jade Avenue and Bowker Road in the northeastern portion of the City of Calexico. There appears to be some discrepancy in the intensity of development being proposed. An initial project review for Caltrans showed a certain number of dwelling units, however the State Clearing House (SCH) cover sheet and other submittals indicate the project will include a different number of dwelling units, plus some 13 acres of commercial land . Please clarify the exact scope of this project proposal.

Although the precise scope of the project is unclear at this time, it appears that the proposed development has the potential to generate some 12,000 Average Daily Trips (ADTs), significantly affecting local and State transportation facilities. In the Department's opinion, the current traffic impact study (TIS) is deficient. A revised TIS will be necessary to determine the project's near-term and long-term effects. The study should be prepared in accordance with the Department's *Guide for the Preparation of Traffic Impact Studies* (TIS Guide), dated December 2002. Minimum contents of the traffic impact study are listed in Appendix "A" of the TIS Guide. The traffic impact study should determine where and what type of improvements might be needed to mitigate for future traffic generated by this development.

Road segments which should be analyzed include the SR-98 facility as well as all affected intersections including, but not limited to, Jade Avenue and Bowker Road. Any proposed "Project Access Point" must be drawn on plans. State-owned signalized intersections must be analyzed using the Intersecting Lane Vehicle (ILV) procedure from the Caltrans *Highway Design Manual* Topic 406, page 400-21. Caltrans requires LOS "C" or better at State-owned facilities, including intersections. If an intersection is currently below LOS "C", any increase in delay from project-generated traffic must be analyzed and mitigated.

Caltrans supports the concept of "Fair Share Contributions" on the part of developers due to traffic impacts caused by proposed developments. This particular proposed development will be responsible for major improvements including widening on SR-98 along the project frontage, as well as "fair share" for additional widening to the west. The developer shall install signals at the Bowker Road and Jade Avenue intersections when warranted and required by Caltrans. Specific requirements will be addressed when the revised traffic study / environmental document are submitted to Caltrans for review.

The Venezia Estates development must be compatible with proposed future improvements for SR-98. The applicant / developer will be responsible for widening of SR-98 to four lanes and additional channelization within the boundaries of the proposed project subdivision area. The Caltrans Transportation Concept Report (TCR) for SR-98 calls for an ultimate 6-lane conventional highway and widening for a total width of 172' (86' half-width) in this area. This ultimate configuration would require some Right of Way (R/W) acquisition along the frontage of this property (to be determined based upon existing State R/W in the vicinity). The applicant will need to obtain from the County of Imperial an Irrevocable Offer of Dedication (IOD) and a slope rights / drainage easement in order to accomplish preserving this R/W. It should be noted that all proposed development improvements, including landscaping and other easements, must be located outside of the R/W IOD.

The intersection of SR-98 and Bowker Road currently exists at a skewed (approximately 45 degrees diagonal) angle. The Bowker Road access should be aligned as close as possible to a perpendicular (90 degrees) intersection with SR-98. Improvements to Bowker Road at SR-98 shall be designed in accordance with the Caltrans Highway Design Manual, Chapter 400. The developer should coordinate with the City of Calexico, the County of Imperial, and landowners to the northeast to ensure an appropriately designed intersection at Bowker Road. Additional channelization and turn pockets may be needed at Bowker Road and Jade Avenue.

In order to adhere to recommended quarter-mile (1/4 mi.) signal spacing on the State Highway, any other connection to SR-98 will need to be aligned with the previously approved Jade Avenue connection from the Tierrasanta subdivision on the northwest of the Highway, thereby forming a perpendicular four-way intersection. The developer may need to coordinate with the City of Calexico and the CM Ranch development to the south in order to make an appropriate perpendicular SR-98 / Jade Avenue connection. Any additional connection to SR-98 will need to be shown on a scale drawing map for the proposed development. No other connections will be allowed to SR-98 between Jade Avenue and Bowker Road, including potentially proposed driveways from the 15-acre commercial parcel. Please provide additional details regarding the proposed specific uses for this triangular-shaped "remainder" parcel.

As part of a cumulative analysis, the project's Traffic Impact Study should include other planned developments within the vicinity of the project, such as CM Ranch. Cumulative impacts of a project, together with other related projects, must be considered when determining a project's impacts, not only to local arterial roads but also to State Highways. A cumulative impact is the sum of the impacts of existing development, other projects, and the project itself – no matter how small the contribution is from the project itself. There is no minimum size limitation on projects that may be required to mitigate for cumulative impacts if the project contributes to the problem in any amount. It may be appropriate for the City of Calexico, by itself or in conjunction with the County of Imperial, to develop and institute a long-range funding program in which new land development shall bear a fair share portion of the associated costs and improvement requirements. The local land use authority could impose appropriate fees for construction of local and regional road facilities as mitigation for cumulative impacts.

While recognizing that topographic and environmental constraints may preclude a strict interconnected grid street network, roads which are routed in parallel can provide an alternative to using the interregional roads or highway, thereby helping to alleviate congestion on State facilities. The developer should therefore coordinate with the adjoining CM Ranch development to extend Cannaregio Road and Calle San Cosmo from Venezia Estates to CM Ranch to the south in order to allow for alternative north / south routes of travel.

Caltrans will not be held responsible for any noise impacts to this development. If there is a noise impact, the developer has the responsibility to provide mitigation. All signs visible to traffic on SR-98 will need to be constructed in compliance with State and County regulations. All lighting (including reflected sunlight) within this project should be placed and/or shielded so as not to be hazardous to vehicles traveling on the State highway.

Any work performed within Caltrans R/W will require an encroachment permit. Furthermore, the indirect effects of any mitigation within Caltrans R/W must be addressed. The developer will be responsible for quantifying the environmental impacts of the improvements (project level analysis) and completing all appropriate mitigation measures for the impacts. The developer will also be responsible for procuring any necessary permits or approvals from regulatory and/or resource agencies prior to issuance of the encroachment permit. Information regarding encroachment permits may be obtained by contacting the Permits Office at (619) 688-6158. Early coordination with Caltrans is strongly advised for all encroachment permits.

Since environmental analysis will be a requirement of encroachment permit by Caltrans, we recommend that the environmental evaluation for the project specify the potential for significant environmental impacts to Caltrans facilities, highways, and resources within the

State R/W. The following impacts have traditionally been critical issues in Caltrans environmental review, and we recommend that they be addressed in the final environmental evaluation for the project: traffic and safety, biological resources, cultural resources, hazardous materials, community impacts, water quality, and visual / aesthetic impacts (including any removal of vegetation or trees). The environmental documentation for the project will need to address the potential for these impacts and describe measures to avoid, minimize, or mitigate impacts to Caltrans facilities, including SR-98 and the bridge over the All American Canal. Identification and completion of appropriate mitigation measures will be a condition of encroachment permit approval. In addition, resource agency coordination and procurement of any necessary regulatory and resource agency permits will be a requirement for encroachment permit approval.

Caltrans appreciates the opportunity to review this development proposal. For questions regarding the Department's comments, please contact Brent McDonald at (619) 688-6819.

Sincerely,

MARIO H. ORSO, Chief
Development Review Branch

cc:	BMcDonald	Planning	MS-50
	KPloettner	Highway Ops	MS-55
	JMarkey	Permits	MS-48
	JGrisafi	R/W Engr	MS-52
	SMorgan	State Clearing House	
	JHeuberger	Imperial County	
	DArvizo	DD&E	

MEMORANDUM

To:	Daniel Arvizo Development, Design & Engineering, Inc	Date:	April 15, 2005
From:	Stacey Rael LLG, Engineers	LLG Ref:	3-04-1451
Subject:	Response to Comments— Venezia Planned Community		

The following discussion is a response to the comments from the County of Imperial Public Works Department (dated March 23, 2005) and from the Department of Transportations (dated March 24, 2005) received regarding the revised traffic study for the Venezia Planned Community dated March 23, 2005.

DEPARTMENT OF PUBLIC WORKS:

COMMENT: Existing Roadway Classifications have been updated in the following descriptions.

RESPONSE:

3.1 Existing Street System

SR 111 (Highway 111) is classified as a State Highway in the Imperial County Circulation Element. SR 111 is a four-lane divided north-south facility providing two lanes of travel in each direction within the project area. State Route 111 is located west of the project site and has a posted speed limit of 65 mph. No bike lanes or bus stops are provided and curbside parking is prohibited.

Meadows Road - Andrade Road is a north-south facility and is classified as a Major Collector in the Imperial County Circulation Element. Meadows Road is currently constructed as a two-lane undivided roadway. No bike lanes or bus stops are provided and curbside parking is prohibited.

Bowker Road is a north-south facility and is classified as a Minor Arterial in the Imperial County Circulation Element. Bowker Road is currently constructed as a two-lane undivided roadway. No bike lanes or bus stops are provided and curbside parking is prohibited. The posted speed limit is 55 mph within the project vicinity.

Jasper Road is an east-west facility and is classified as a Major Collector in the Imperial County Circulation Element. Jasper Road is currently constructed as a two-lane undivided roadway. No bike lanes or bus stops are provided and curbside parking is prohibited.

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Cole Road is classified as a Prime Arterial in the Imperial County Circulation Element. Cole Road is an east-west facility within the City of Calexico. East of SR 111, Cole Road is currently being constructed as a four-lane divided roadway between SR 111 and SR 98. The posted speed limit on Cole Road within the project area is 55 mph. Curbside parking is prohibited along both sides of the roadway and bus stops are not provided.

COMMENT: Year 2025 Analysis, Street Segment Table

RESPONSE:

TABLE 9–2

YEAR 2025 STREET SEGMENT OPERATIONS

Street Segment	Future Roadway Classification	Future Capacity (LOS E)[a]	Year 2025 With Project		
			ADT[b, c]	V/C[d]	LOS[e]
SR 98					
SR 111 to Meadows – Andrade Road	State Highway	34,200	27,100	0.79	C
Meadows – Andrade Road to Bowker Road	State Highway	34,200	28,200	0.82	D
Bowker Road to Cole Road	State Highway	34,200	29,000	0.85	D
Bowker Road					
South of SR 98	Minor Arterial	37,000	3,000	0.08	A

Footnotes:

a. County of Imperial Roadway Standard Street Classification (*Appendix C*).
b. Average Daily Traffic
c. ADT volumes obtained from Caltrans: Imperial County Travel Model
d. Volume to Capacity ratio
e. Level of Service

COMMENT: County of Imperial Roadway Classifications

RESPONSE: The updated Imperial County General Plan Circulation and Scenic Highways Element (December 16, 2003) is attached to this set of responses and serves to update the Venezia Planned Community Traffic Study Appendix.

DEPARTMENT OF TRANSPORTATION (CALTRANS)

COMMENT: ILV Analysis

RESPONSE: The Intersecting Lane Vehicles (ILV) methodology, prescribed by Caltrans for the analysis of signalized intersections, was used to determine the operations of three intersections on SR 98 (SR 98 / SR 111, SR 98 / Rockwood Road, and SR 98 / Andrade Road / Meadows Road) proximate to the proposed project. These intersections were analyzed for three scenarios; Existing, Existing + Project, and Existing + Project + Cumulative Projects. ***Table A*** lists the intersection operation results.

The Existing analysis table shows that all three intersections operate under capacity in the AM and PM peak hours except for the SR 98 / Rockwood Road intersection, which operates near capacity in the PM peak hour.

The Existing + Project analysis shows that all three intersections continue to operate under capacity in the AM and PM peak hours except for the SR 98 / Rockwood Road intersection, which operates near capacity in the PM peak hour.

The Existing + Project + Cumulative Projects analysis shows that the SR 98 / SR 111 intersection is calculated to operate over capacity in both the AM and PM peak hours; SR 98 / Rockwood Road is calculated to operate near capacity in the AM peak hour and over capacity in the PM peak hour; and SR 98 / Andrade Road / Meadows Road is calculated to operate under capacity in both the AM and PM peak hours.

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TABLE A
EXISTING ILV OPERATIONS

Intersection	Peak Hour	Total Operating Level (ILV / Hour)	Capacity
SR 98 / SR 111	AM	944	Under
	PM	1114	Under
SR 98 / Rockwood Road	AM	1129	Under
	PM	1250	Near
SR 98 / Andrade Road / Meadows Road	AM	612	Under
	PM	562	Under

EXISTING + PROJECT ILV OPERATIONS

Intersection	Peak Hour	Total Operating Level (ILV / Hour)	Capacity
SR 98 / SR 111	AM	993	Under
	PM	1190	Under
SR 98 / Rockwood Road	AM	1163	Under
	PM	1327	Near
SR 98 / Andrade Road / Meadows Road	AM	660	Under
	PM	679	Under

EXISTING + PROJECT + CUMULATIVE PROJECTS ILV OPERATIONS

Intersection	Peak Hour	Total Operating Level (ILV / Hour)	Capacity
SR 98 / SR 111	AM	1584	Over
	PM	2329	Over
SR 98 / Rockwood Road	AM	1323	Near
	PM	1734	Over
SR 98 / Andrade Road / Meadows Road	AM	933	Under
	PM	1090	Under

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Table B shows the ILV AM and PM peak hour operations for the SR 98 / Bowker Road intersection using the Intersecting Lane Vehicle (ILV) methodology. The traffic impact study recommends that this two-way stop controlled intersection be signalized with commencement of the project construction. To this end, an ILV analysis was completed for the suggested signalized intersection using traffic volumes from the Existing + Project + Cumulative Projects scenario (i.e. the worst near-term case).

TABLE B

***SIGNALIZED* SR 98 / BOWKER ROAD ILV OPERATIONS**

Intersection	Peak Hour	Total Operating Level (ILV / Hour)	Capacity
SR 98 / Bowker Road	AM	731	Under
	PM	1068	Under

Footnotes:

SR 98 / Bowker Road is currently a two-way stop controlled intersection. The traffic impact study recommends that a signal be installed at this location once the project commences construction. To this end, the ILV operations analyzed above considers the Ex + P + CP scenario with the addition of the traffic signal.

COMMENT: Future Development South of Venezia Planned Community

RESPONSE: Future co-ordination with the CM Ranch development south of the Venezia Planned Community project site is recommended in order to establish appropriate / alternative connections with proposed streets between the two projects.

Engineering Department Memorandum

To: Ricardo Hinojosa, Director of Planning
Cc: Mart Martinez, Public Works Director
From: Tony Wong, City Engineer
Date: March 30, 2005
Subject: Venezia Estate Subdivision MND and the Tentative Tract Map

Ricardo,

This memorandum is to inform you that the Public Works/Engineering Department has completed the review of the responses on the subject MND.
Attached is the Review and Analysis of MND Comments for the referenced project.
If you have any questions, please do not hesitate to contact me at Ext. 462.

Venezia Estates
Tentative Tract Map
Review and Analysis of MND Comments
Public Works/Engineering Department

March 30, 2005
UA2004-34

Comments to MND responses are in bold face and italic.

I. Street Circulation Element Issues and Impact

1. Highway 98 connection should be made at vicinity of Jade Ave. of the Tierrasanta Subdivision. The future road connection from this proposal should be compatible with the already approved Jade Ave. connection by Caltrans. The proposed east-west street identified in the map as Calle Vernier will need to provide **84' R/W** width. This street alignment is at issue that there has not been any progress made with the owner of Tierrasanta Subdivision and Caltrans. The Owner/Developer shall be required to contact, mitigate, and secure an approved alignment and connection with Hwy 98 from Caltrans and the owner of the Tierrasanta Subdivision development.

This item has not been satisfactorily mitigated. A concurrence and approval letter from the affected property owner and Caltrans on the intersection relocation will be required prior to the final MND certification for the CEQA clearance. The proposed east-west street identified in the map as Calle Vernier will need to provide 84' R/W width and thru the Commercial Development to this intersection at Hwy 98.

2. Bowker Road need to be extended to include the **bridge widen** at Highway 98 to include the All American Canal. The bridge and highway combine alignment is approximately 350 feet in length by 100 feet in width on Bowker Road. Additionally, Hwy 98 widening to **four lanes** may be required on both side. Fair share cost will be determined as part of the Eastside Calexico Facilities II Study undertaken by the CM Ranch development.

Traffic Analysis has determined that Bowker Road north of LaVigne Road will be six-lanes; therefore, a 126' R/W dedication is required. Base on the traffic analysis and the review comments and recommendation of Imperial County Public Works and the development's access point, Bowker Road is the only existing ingress and egress access

water master plan at the eastside. The **30-inch diameter line** running north at Bowker Road will benefit this development; however, a second waterline loop will be required at the eastside street tract boundary.

2. Prepare a water master plan that integrates with the City's Phase III and the CM Ranch water master plan.

3. Provide a second connection of proper size at the eastside to form a loop connection for the water master plan as stated in Item 1 above.

Funding obligation for the Phase III water master plan is also needed. The construction cost is estimated at $7,500,000 plus 15% administration and construction engineering.

VI. Community Facility District

1. A cost participation for the regional infrastructure program (i.e. the **East Calexico Facilities Area II Improvement)** will be needed. This program is being addressed by the City's consultant on the CM Ranch development that will included but not limited to: **off-site streets, bridges at La Vigne Road and Bowker Road at the All American Canal, sewer distribution line and lift station, water, regional retention basins, and storm drain systems, etc.**

2. A maintenance and operation of the Regional Retention Basin for drainage will need to be addressed.

Developers' commitment in the formation of CFD is needed.

III. Drainage Element Issues and Impact

1. Integrate retention basin design with the City's master plan of retention basins to accompany the Regional Retention Basin Concept. This will be maintained by setup of a community facility district.

2. Prepare a master drainage plan to comply with the City's current design standard and criteria.

IV. Sewer Element Issues and Impact

1. The of-site trunk sewer line and the Regional Pump Station that the development connects at Bowker Road are not available yet. This development will need to coordinate with the City's master plan of sewer development in order to arrive a proper priority and the schedule of the availability for both developments. The pump station at Tierrasanta Unit 1 is not adequate to accommodate this development. Additionally, its force main to Highway 98 and Meadows Road has not yet been built. The gravity line at Sapphire Street may not have adequate depth for this development without a major reconstruction of the Tierrasanta Subdivision gravity sewer line and the upgrade of the Lift Station including the force main (FM) line.

2. Prepare a sewer master plan that is in accordance with the City's master sewer plan and to ascertain that the trunk gravity line will be able to accompany the flow, or to upgrade the Tierrasanta Unit 1 pump station and its gravity line and the yet to be built force main (FM) to receive the flows from this development. **Submit a sewer feasibility study as part of the Tentative Map submittal.** All costs shall be responsible by this development.

The Preliminary Master Sewer Study dated March, 2005 is not adequate. The deficient points are outlined as follows:

1. ***It has not considered the available capacity of the existing 21" diameter gravity flow pipe at Hwy 98 and Meadows Road.***
2. ***Provide a demand analysis of the Sewer Service Areas "G" and "I" because this development is within the Sewer Service Area "H" in the City's Sewer Master Plan.***
3. ***The Submersible pumps are not acceptable City Standard. The master plan layout need to continue to the existing pump location and replace with the higher capacity pumps that conforms to the***

City standard (Use Gorman Rupp Self Priming Lift Impeller type pumps).

4. *Provide a cost estimate for upgrade of the pump station and all off-site lines for both the gravity and force main line.*

City's Analysis:

"An Evaluation Report of Wastewater and Treatment Plant Expansion and Sewer Line Upgrade" (Report) by Tetra Tech, Inc. showed the Hydraulic Capacity at Meadows and Hwy 98 is 2,800gpm for the 21" diameter line. A more liberal flow capacity can be extended to 3,400gpm. This sewer line is currently serving Sewer Service Area "G" and "I" that consisted of 498 acres and 1,510 acres respectively. Using its general criteria of 2.2gpm/acre, this projects to a demand flow of 4,420gpm in which we still have a deficient capacity of 1,020gpm. Currently some of the Bravo Victoria, Eastside Village, and Las Brisas homes are still under construction, but when these homes are completed at its build out, there is no capacity to accommodate this proposed tract development. This development is part of the Sewer Service Area "H" as identified in the City's Sewer Service Area Master Plan. The final plan will ultimately have to be reverted to drain to the City's Regional Sewer Pump Station at Bowker and LaVigne as it is currently planned.

Additionally, the "Report" identified that there is no excess plant capacity to support future development without obligating a twenty million dollar ($17,900,000 construction plus design engineering, administration, and construction engineering) CIP funding for upgrade of the existing sewer plant.

The Regional Pump Station and the force main will be part of the fair share cost element in the City's Sewer Master Plan.

Provide a complete feasibility study together with cost estimate for the upgrade of the force main line, the 12" diameter gravity line, the pump station and wet well plus the modification of the switch back to drain to the Regional Pump Station requirement.

V. Water Element Issues and Impact

1. The City is currently proceeding on the construction phase of its Phase III

point; therefore, the connection near Jade Ave. and Hwy 98 is an important mitigation measure that must be secure prior to the approval of CEQA clearance. Additionally, the mitigation measure for the Bowker Road and Hwy 98 intersection improvement will need to be constructed prior to the issuance of occupancy permit.
Bowker Road and Hwy 98 intersection will have to be designed and improved as part of the mitigation measures and conditions of approval of the tentative map.
(Emphasize: Bowker Road R/W and traffic flow distribution at South of Hwy 98 is still being re-evaluated regarding to the 100'R/W vs. the 126'R/W).

3. Layout of street pattern should be in compliance with the City's General Plan Circulation Element (i.e. Jade Ave. connection as identified in Item 1 above).

See I-1 above

4. Identify other collector streets with the adjacent development layouts such as the City's master plan concept that is currently under development. Calle De Camaro south bound will have **to be connected thru to Second Street at the South.**

5. Provide street connection of 75 **feet R/W north-south street** connection at approximately 1,000 feet west of the eastside tract boundary. The City is currently making the design coordination between these two developments to comply with the City's Street Circulation Element.

The MND responses identified the wrong location. See returned Tentative Map markup.

6. Prepare a revised Tentative Map with the final resolution of the street alignment identified above.

The Public Works/Engineering Department will need a revised Tentative Map with the changes identified herein.

II. Traffic Issues and Impact Analysis

This section will be discussed and analyzed by the City Traffic Engineer in a separate letter report document.

We have requested the Planning Department to forward the Traffic Responses for review on 3-22-05.